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ABSTRACT

These Congressional hearings contain testimony dealing with the Job Training Partnership Act (JTPA). Included among those persons providing testimony at the hearings were representatives of the following agencies and organizations: the National Governors' Association, the Department of Labor, the Office of Management and Budget, the National Commission for Employment Policy, the National Association of Counties, the National Alliance of Business, the National Association of Private Industry Councils, the AFL-CIO, and the Cumberland County Training Resource Center of Portland, Maine. The focus of the testimony was on various aspects of the implementation and evaluation of the JTPA, including the nature and extent of state and local governmental action in implementing the act, the development and use of interstate supportive structures to consolidate the program, the role of private industry councils (PICs) in implementing the act, and the development and utilization of performance standards to assess the effectiveness of JTPA programs. (MN)

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IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

HEARINGS

BEFORE A

SUBCOMMITTEE OF THE
COMMITTEE ON
GOVERNMENT OPERATIONS
HOUSE OF REPRESENTATIVES

NINETY-EIGHTH CONGRESS

FIRST SESSION

JULY 12, 14, AND AUGUST 2, 1983

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IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

TUESDAY, JULY 12, 1983

House of Representatives,
Manpower and Housing Subcommittee
of the Committee on Government Operations,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:30 a.m., in room 2247, Rayburn House Office Building, Hon. Barney Frank (chairman of the subcommittee) presiding.

Present: Representatives Barney Frank, Mel Levine, Major R. Owens, John M. Spratt, Jr., and John R. McKernan, Jr.

Also present: Larry White, professional staff member; June D. Saxton, clerk; and Nancy Elwood, minority professional staff, Committee on Government Operations.

OPENING STATEMENT OF CHAIRMAN FRANK

Mr. **Frank.** The hearing of the Subcommittee on Manpower and Housing of the Government Operations Committee will come to order.

This is the first hearing we are having in our oversight function on a very important issue, the implementation of the Job Training Partnership Act. Clearly, the function of providing adequate job training to people is a central problem for us—adequate both in the sense that the training is well done and that jobs exist for which people are being trained.

We are now in an economic situation in which we have a recovery going on but one that does not seem likely to, on its own, reduce unemployment to the level which many of us would think tolerable.

The Job Training Partnership Act will have to be one of the major instruments but by no means the only one that we use to deal with what appears to be a lingering unemployment problem. We may be coming out of a recession and have, in the middle of a recovery, unemployment levels higher than at the depth of a recession. That clearly has to be addressed.

The Job Training Partnership Act began with a bipartisan spirit and I am hopeful that we can continue that bipartisan spirit. This is one program about which there does not seem at this point to be partisan or any logical disagreement. The notion that it is a reasonable Federal Government function to provide the funds for and help administer a training program of this sort is widely held.

The purpose of these hearings is to go forward in that spirit, to talk with those who will have the responsibility at both the Federal and non-Federal levels of administration. They are to begin at the outset, I hope, a cooperative process of working together so that the rules and regulations according to which we conduct this program are clear and are the product of some agreement.

I had hoped to have the Office of Management and Budget testify in this current phase of hearings which will take place today and on Thursday. They have asked for a little more time. They are still in the process of deciding their position on the regulations promulgated. I am determined that they will testify, and at an appropriate point they will. While it is important that all participating groups, including business, labor, local governments, and others work together with the Department of Labor in promulgating rules and regulations, obviously the approval of the Office of Management and Budget is essential.

The one important perspective that I and others bring to this is that while there are enormous virtues to flexibility and local participation legislated by the act, this is also a Federal program and it is important that we keep that in mind. Standards and regulations must be promulgated which keep this a Federal program and allow us to do the kind of measurement and checking which will provide us with not only, we hope, a well-run program, but the information that we will need to make any alterations that may be necessary.

No one yet knows for sure how best to run a job training partnership program.

Obviously job training is not a substitute for the kind of economic policies that provide a higher level of employment, but it is an essential part of an overall national policy that reduces the intolerable and destructive levels of unemployment that we now have and it is in that spirit that these hearings will be conducted.

Mr. McKernan.

Mr. McKERNAN. Thank you, Mr. Chairman. I just have a brief statement.

I was not a Member of the Congress when the Job Training Partnership Act was passed. I do think, however, that it was a step in the right direction in calling for even more local involvement. The whole public, private, partnership aspect of the Job Training Partnership Act is an important one if we really are going to have the kind of effective job training program that I think is essential, especially as we hear today about the changing economy in this country and the continued need of people to upgrade their skills as well as those who are displaced having to attain new skills.

I commend the chairman for conducting these hearings because I for one think that one of the greatest attributes of the Job Training Partnership Act has been the change from the way the old CETA program has been run to what I hope is going to be a program which is going to have even more local involvement. It is going to allow States and local labor markets to run their own programs and to meet standards.

I think that what the Federal Government ought to be doing in most of its programs frankly is allowing the kind of local control that can design a program that is going to best suit the needs of local areas, but as the chairman said, to maintain some oversight and some way to evaluate these programs through national standards that need to be met in whatever is the best way for a local area.

In my view, that is the intent of the Job Training Partnership Act. It is the intent of these hearings to see how those standards are going to work and to make sure that they are going to be in effect in time for us to judge whether or not this act is going to be successful when it begins in October of 1983.

So, Mr. Chairman, I look forward to participating and I commend you for holding these hearings.

Mr. **Frank**. Thank you, Mr. McKernan.

We will begin with Patricia Hogue who is the Director for the National Commission for Employment Policy.

STATEMENT OF PATRICIA W. HOGUE, DIRECTOR, NATIONAL COMMISSION FOR EMPLOYMENT POLICY, ACCOMPANIED BY JOHN WALLACE, ASSISTANT DIRECTOR,

Ms. **Hogue**. Thank you, Mr. Chairman.

I think I could open by saying that I certainly wholeheartedly agree with both the chairman and Congressman McKernan on their observations on the Job Training Partnership Act and probably if I was smart, I would just quit while I was ahead and go back and sit down.

I do want to thank you for inviting the Commission to testify this morning. With me is John Wallace who is the Assistant Director of the Commission. He was formerly the Director of Human Services in San Mateo, Calif., and is really the Commission's expert on performance standards.

We are very pleased to be invited to present testimony to you on the current state of implementation of the Job Training Partnership Act. The fact that you have chosen to hold hearings at this point in the implementation sends out a clear message to the employment and training community: Congress will continue to be concerned about the program, its operators and the people it serves and will continue to pay close attention to implementation and results.

The National Commission for Employment Policy believes that these hearings offer an opportunity for positive congressional involvement in the implementation process.

As you review the testimony from these hearings, we would urge you to consider that a complex system of new relationships is being formed under JTPA in over 600 areas and institutions across the Nation—and all of this is being done in less than 12 months. Hence, many people in many places are undergoing many changes in a very short period of time.

We want to emphasize that the Department of Labor has met or exceeded all of the statutory deadlines and has been very efficient in its implementation of the law. But 90 percent of the transition effort must take place at the State and local levels. All the actors in the system—from Federal officials to State officials to elected officials and program operators, private sector representatives, public interest groups, and the commission—are not only in an implementation process, they are in a learning process as well. Recognized as such, we can expect some delays and errors. While it is important to shed light on these problems, we have observed that when problems have been identified, they have generally been resolved at all levels.

The Job Training Partnership makes two major changes, First, it measures outcome on the basis of performance standards, not on the process of how you should plan and run programs. The act's emphasis on results is really a major legislative shift in social policy. Performance standards, I think more than any other part of JPTA are critical to an outcome's base system.

The second major change is in the roles of the Federal and State governments as well as in the relationship at the local level between the local elected officials and the private sector.

The Federal Government now serves as the top manager in the system, the States serve as middle managers and at the local level a partnership between local elected officials and representatives of the private sector through private industry councils share full and equal responsibility for program planning and service delivery.

Now under the act, our Commission is assigned several specific duties relating to these major changes. The first is a responsibility to advise the department on the development and implementation of performance standards and to evaluate the impact that performance standards have on client characteristics, program outcomes and program costs.

Our second major charge is to monitor JTPA transition activities and the third is to conduct research and evaluation, to measure success and improve program performance.

The testimony I am going to give today will focus on the first two activities, performance standards and monitoring JPTA implementation. You have my written testimony. In the interest of time, what I would like to do is summarize three major points in that testimony.

The first major point I would like to make is that the commission strongly supports the Department of Labor's approach to performance standards and joins the JTPA Performance Standards Advisory Committee in applauding the method chosen by the department to set performance standards.

The procedure is called regression analysis. It is technical but it really offers the most objective and effective way available to take into account different economic conditions and client characteristics. For example, if one area has an unemployment rate of 20 percent and another area has an unemployment rate of 5 percent, the regression method sets performance standards that take these differences into account. It can also take into account different client characteristics in different areas. If one area decides to serve more welfare clients than another area, that will be taken into consideration in setting the performance standards.

Linked with the performance incentive bonuses for good performance which are set in the law and the potential sanctions for poor performance, this method of setting performance standards really forces the entire system to improve each year. The basic fairness and rationality of this approach has brought about as close to universal support throughout the employment and training community as one could hope for. Local areas and States have had experience with it for the past 2 years under CETA so it is not entirely new.

My second point is closely linked with the first. That is the commission strongly supports as the minimum the reporting system recommended by the department and published in the April 26 Federal Register. The Commission also strongly believes that consistently defined local information reported through States is important to the long-term success and viability of JTPA.

National reporting of program outcomes, client characteristics and program activities is absolutely essential for two reasons. It is critical to good management and oversight and it is critical to a good system based on performance.

If all 50 States establish their own reporting systems there would be no guarantee of comparability of information across States.

Let me just take one example. Suppose after the first program year Massachusetts has a 50-percent placement rate. While, Texas, for example, might have a 60-percent placement rate. On further investigation, however, we can discover that half of the participants in Massachusetts were really high school dropouts while Texas served very few high school dropouts. The relative performance of the two States is quite different for that group. In fact, Massachusetts may well be doing much better than Texas but the absolute number doesn't show that.

But Congress and the administration would not be able to make that comparison unless both States were required to gather the information. About 10 such characteristics have been identified that affect performance and the department is requiring that these are reported on a national basis.

Mr. **Frank**. Ms. Hogue, while I appreciate the deference to me in the example, candor compels me to point out the chairman of the full committee is from Texas. I just thought I would put that in the record.

Ms. **Hogue**. Well, I am sure that we can think of an example of good preformance that will include Texas as well.

I think that probably the chairman of the full committee would appreciate that reporting of outcomes and characteristics and activities is fully consistent with JTPA's emphasis on results because it will let the gentleman from Texas really compare with the gentleman from Massachusetts on how well each program is doing and without that information we could not make those comparisons. It really lets Congress and the administration, who are ultimately responsible for the expenditure of the tax dollars, know the returns they are receiving on their investment. That is really the bottom line in this program. Without that information Congress just will not be able to make those kinds of comparisons.

Finally, I would say good management requires good information. The information age of efficient and expensive computers has arrived so reporting is not, quite literally, the paperwork burden it used to be.

National reporting is also necessary for us to be able to use the department's approach to performance standards. As I said earlier, the regression technique permits us to set standards objectively and to compare fairly the performance of different areas that enroll different types of participants. The department has identified 10 key characteristics such as age, sex, and educational levels which have historically affected performance. Without national reporting of these characteristics, the regression technique could not be used.

National reporting based on sampling has been offered as one alternative to national reporting on all participants in the system. However, this does not alter the need for consistent gathering of consistently defined data for the purposes of good management.

The third point I would like to talk about this morning concerns implementation. The commission has been closely monitoring programs and policy development issues surrounding implementation since the Job Training Partnership Act was passed last October. We did one study early on in the transition back in November and December. At that time there was some doubt as to whether the States were going to meet all their deadlines that were set in the law for getting their councils appointed and in place and setting service delivery areas. There was also a strong desire expressed by the States at that time to have more technical assistance from the Labor Department to help them implement the act.

We have just recently completed a second assessment of what is going on in the States. We did this in coordination and cooperation with the National Governors Association. The assessment was done by MDC, Inc. of North Carolina. We have just got ten preliminary results in so what I am going to report to you on is going to need a little bit more analysis, but I did want to bring it to your attention since you were holding the hearings this week. Again, this report focuses on the States. It included a few local site visits but since, in most areas the SDA's were just getting organized, PIC's were just getting appointed, we did not concentrate heavily on the SDA's at this time.

What we find at this point is that in general, most States have been able to meet all the deadlines that were set under the law.

Second, the Labor Department has provided more technical assistance both through its own staff and through the staffs of a number of national organizations and so that has been positive change since our first assessment.

There are some other major findings which I would like to just briefly review and they are on page 8 in my written testimony if you would like to just follow along or glance at them. I have to caution that this information is still being analyzed. We expect the report to be finally released in early August. There is a question of timeliness in terms of numbers in these reports but I think what we are concerned about is not so much how many SDA's have been appointed and how many people are members of councils but the trends that are going on in the system. And so that is what our report is going to focus on.

First trend. Most Governors have given a high priority to JTPA implementation. There is a far greater involvement of ranking State officials under JTPA than under CETA.

Second point, States are taking JTPA seriously. The Governors' statement of goals, objectives and coordination criteria are being approached seriously and in a number of areas very innovatively.

Third, business level involvement at the State level appears to be greater under JTPA than CETA.

Fourth, in the area of local continuity from CETA to JTPA, there will be approximately 580 service delivery areas. This is a net gain of about 20 percent over the 474 CETA prime sponsors in the 50 States. Twenty percent of the SDA's will cover jurisdictions that had no previous employment and training program administrative experience. Most of these are in rural areas previously administered by States. For obvious reasons, it is here that the startup problems will be the greatest and where there is a good deal of concern.

Fifth, there appears to be considerable administrative continuity at the State level. Only nine States have opted to move the administration of JTPA from the agency which administered CETA.

Sixth, many local areas have done advance planning in anticipation of formal service delivery area designation. So despite the fact that some of the formal steps have not been taken there is a lot that has been going on behind the scenes and so some of them can move quite rapidly.

Seventh, many of the members of State Job Training Coordinating Councils are new but over time most States expect the councils to play an important role in policy development.

Eighth, most States and local areas still voiced serious concern about the quality of planning that could be accomplished during the short time, less than 4 months in some cases, between designating service delivery areas and approving local plans. As such, there was a concern that planning for the 9-month period that begins October 1 would be very tightly compressed and result in very little programmatic change at least for the first 9 months. The time that is available requires most of its focus on administration and governance rather than on program planning.

Ninth, the States were asked whether they had encountered or anticipated significant problems. Apart from time lines, 18 States said they did not anticipate significant problems in any area but 32 States indicated that they did anticipate problems in at least one area.

States also said that they had anticipated having some of their greatest difficulties in the area of audit and debt collection under JTPA.

Tenth, States indicated that for the most part they plan to provide assistance to local areas in implementing JTPA but their energies have been almost totally absorbed in meeting their own deadlines.

Finally, many States indicated there would be a continuing need for formal management assistance and staff development at the State and local levels after October 1.

Let me strongly reiterate our support for the Department of Labor's objective performance standards and a complementary national reporting system as put forth in the April 26 Federal Register. These two systems are really symbiotic and they are critical to good performance, management and oversight. Further, we believe that the Department of Labor, States and localities and the various interest groups should really be commended for the efforts they have put forth to date to implement the Job Training Partnership

Act. There certainly are some problems and I think some of the biggest challenges are going to come as all the concern about administration and organization has to be translated into program results for participants.

At this time, we do not see any problems that can't be overcome by administrative action and a continued high level of commitment to success at Federal, State, and local levels.

Probably the most important conclusion of our recent assessment of implementation is that this first 9 months from October 1983 to June of 1984 should really be considered by everyone as a continuation of the transition process. We need to have some realistic expectations that not much new is going to be accomplished in this period. Most areas are going to use it to plan for the first full program year which begins in July of 1984.

Finally, the Commission will continue to monitor JTPA programs and policies and of course we look forward to working with this committee and Congress and the administration in doing so.

Thank you very much.

Mr. **Frank**. Thank you.

[The prepared statement of Ms. Hogue follows:]

TESTIMONY OF

PATRICIA W. HOGUE, DIRECTOR

NATIONAL COMMISSION FOR EMPLOYMENT POLICY

Mr. Chairman and members of the Subcommittee: we are pleased to be invited to present testimony to you on the current state of implementation of the Job Training Partnership Act of 1982 (JTPA). Since JTPA is an important part of the Nation's employment and training system, the fact that you have chosen to hold hearings at this point in implementation sends out a clear message to the employment and training community: Congress will continue to be concerned about the program, its operators, and the people it serves, and will continue to pay close attention to its implementation and results. The National Commission for Employment Policy believes that these hearings offer an opportunity for positive congressional involvement in the implementation process.

The purpose of the Job Training Partnership Act is "to establish programs to prepare youth and unskilled adults for entry into the labor force and to afford job training to those economically disadvantaged individuals and other individuals facing serious barriers to employment, who are in special need of such training to obtain productive employment" (JTPA, Section 2). The Act was the result of a truly bipartisan effort by Members of Congress and the Administration who believe in the need for a strong, decentralized employment and training system. It was and continues to be supported by a broad coalition of public interest groups. This is understandable, since the employment and training system that JTPA is building upon is not new. It is an outgrowth of nearly 25 years of Federal involvement in employment and training that began with the Area Redevelopment Act of 1961.

The National Commission for Employment Policy was initially authorized in 1973 as part of the Comprehensive Employment and Training Act (CETA). The Commission was given permanent authorization under JTPA. On October 1st of this year we will become a 15-member, presidentially appointed advisory commission. The Commission's general responsibilities are to investigate employment problems, evaluate employment programs, and provide policy advice to Congress and the President on employment and training issues.

Under the Act, the Commission is assigned several specific duties relating to JTPA. For the purpose of these hearings, there are three sets of activities I would like to describe for you.

First, the Commission has the specific responsibility to advise the Department of Labor on the development and implementation of performance standards, and to evaluate the impact that performance standards have on client characteristics, program outcomes, and program costs. We have devoted a great deal of time to performance standards and national reporting because they form the cornerstone of the JTPA system and are the key to its success.

Second, we are monitoring JTPA transition activities. We have sponsored research that assesses the status of implementation in all 50 States and several local areas. The first report was released last December. I will discuss some of the preliminary results of the second report, which will be issued in early August.

Third, we have initiated a series of short- and long-term research and evaluation projects related to JTPA. The issues were identified with the help of the U.S. Department of Labor and over one hundred other professionals in the field. The short-term projects should be of particular interest to the Subcommittee, since the studies attempt to provide useful information to practitioners in the field on how to deal with the major changes from CETA to JTPA.

General Observations

Before turning to these issues, I would like to make some general observations about JTPA. First, the Act sets up a new job training delivery system and establishes new *roles* and *relationships* among the main actors in employment and training. Three of these are key:

- The Federal role is more limited under JTPA than under its predecessors, but is still crucial. In meeting its statutory responsibilities, the Federal Government drives the system by defining the overall goals to be achieved, providing the funds to reach the goals, and setting the performance standards to measure whether the goals are met. In short, the Federal Government, like the top management in a corporation, focuses on predefined outcomes, not process.
- States, for the first time, have the key administrative role in the system. Among other things, they perform the important "middle management" functions in addition to having responsibility for program coordination and long-term technical assistance for the system.
- A partnership between local elected officials and representatives of the private sector, through private industry councils, shares full and equal responsibility and authority for program planning and service delivery at the local level.

Second, as you review the testimony from these hearings, we would urge you to consider that a complex system of new relationships is being formed under JTPA in over 600 areas and institutions across the Nation--and all of this is being done in less than 12 months. Hence, many people in many places are undergoing many changes in a very short period of time. We want to emphasize that the Department of Labor has met or exceeded all of the statutory deadlines and has been very efficient in its implementation of the law. But 90 percent of the transition effort must take place at the State and local levels. All the actors in the system--from Federal officials to State officials to local elected officials and program operators, private sector representatives, public interest groups, and the Commission--are not only in an *implementation* process, they are in a *learning* process as well. Recognized as such, we can expect some delays and errors. While it is important to shed light on these problems, we have observed that when problems have been identified, they have generally been resolved at all levels.

Third, JTPA emphasizes outcomes, not process. How local service deliverers run their programs is going to be far less important than the results that are achieved. The Act's emphasis on *results* is a major legislative shift in social policy. Performance standards, more than any other part of JTPA, are critical to the outcomes-based system. Their importance is emphasized by the fact that up to 6 percent of the funds allocated to States can be used to reward high performers, and that sanctions must be applied to consistently poor performers.

The final general observation I would like to make is that this new system, even after all the pieces are in place, will need time to develop. Probably the most important conclusion of our recent assessment of implementation is that the nine-month period that begins on October 1st of this year should be considered by all of us as a continuation of the transition that started in October of last year. We need to have realistic expectations for that period of time and to continue our collective efforts to support the development of the new system.

PERFORMANCE STANDARDS

Performance Standards for Title II

One of the most critical changes in the new Job Training Partnership Act is the mandate for performance standards. Section 106 of the Act provides for a dual Federal-State role in establishing performance standards. First, the Secretary selects the measures of performance and establishes standards and parameters for these measures. Second, the Governors may then prescribe, within the parameters established by the Secretary, variations in the standards for each local area based on specific economic, geographic, and demographic factors. Section 106 also requires that the Commission provide advice to the Secretary as performance standards are developed and implemented.

The Commission strongly supports the Department of Labor's approach to performance standards, and joins the JTPA Performance Standards Advisory Committee in applauding the method chosen by the Department to set performance standards. The procedure, called "regression analysis," is technical, but it offers the most objective way available to take into account different economic conditions and client characteristics. For example, suppose one area has a 20 percent unemployment rate, and another area has a 5 percent rate. The regression method sets performance standards that take these differences into account, so we can legitimately compare results. It also takes into account the characteristics of each area's clients, so that, for example, a city which chooses to serve many more welfare clients is not penalized compared to an area which serves very few. Linked with the performance incentive bonuses for good performers and the potential sanctions for poor performers, this method also forces the entire system to improve each year.

The basic fairness and rationality of this approach to performance standards has brought about as close to "universal support" throughout the employment and training community as one could hope for. Local areas and States have experimented with it for the last two years under CETA, so it is not entirely new.

Several other issues should be mentioned with regard to title II performance standards. The law emphasizes longer-term benefits to people in the program. The Department has temporarily postponed setting standards for measures such as job retention and welfare reductions. We support this position. There is no adequate history or information on which to base these standards, so the Department has postponed establishing them and is requiring that the follow-up information be gathered so that such standards can be set in the future.

Further, Section 106(b)(2) of the law states that gaining "employment competencies" is a legitimate outcome for youth. However, the Department has not included a standard or reporting element for this outcome in its April 26th Federal Register notice. We are very concerned that this may lead to a severe reduction or termination of services to in-school youth, since employment is identified as the only appropriate outcome for youth who, as a result of being in the program, remain in school and do not drop out. We believe that the performance standards for youth should recognize that continuing in school is a valid outcome.

And finally, Congress should be aware that that the initial standards established for the nine-month period beginning October 1st of this year may be unrealistically high, given the enormous change taking place in the system.

Performance Standards for Titles III, IV and V

In the area of performance standards for the title III program, "Employment and Training Assistance for Dislocated Workers," we support the Department's position of not establishing standards for the nine-month transition period, but instead of selecting the measures and providing information to Governors that permit them to set standards for this period. Title III is a new program that lacks an adequate information base for the Secretary to set standards.

Creation of performance standards also appear to be progressing well for the national programs authorized under title IV: the Job Corps, and programs for migrant and seasonal farmworkers, Indians and native Americans, and veterans. The Commission's major recommendation here is that the measures selected for these programs, and the definitions of these measures, be consistent with the title II measures and definitions. This should bring about greater rationality and comparability among employment and training programs. We have made a similar recommendation to the Department regarding the standards for the Employment Service and the Work Incentive Program, which were amended under title V of JTPA.

NEED FOR A NATIONAL REPORTING SYSTEM

Section 165 of the Act authorizes the Secretary of Labor to establish a reporting system. The Commission strongly supports, as the minimum, the reporting system recommended by the Department of Labor and published in the April 26th Federal Register. The Commission strongly believes that consistently defined local information, reported through the States, is important to the long-term success and viability of JTPA. Providing advice in this area forms one of the main statutory responsibilities of the Commission.

National reporting of program outcomes, client characteristics, and program activities is absolutely essential for two reasons: (1) it is critical to good management and oversight; and (2) it is critical to a good system based on performance standards.

Good Management and Oversight

JTPA is very much like a single-product corporation that produces, if you will, the same item at 550 or so service delivery areas through 50 middle managers. Since all these operations have the same objective--providing skilled workers--then consistent information about the system is an important tool for all the managers. In addition, it is costeffective. Rather than have 50 different States develop reporting systems, which may or may not correspond, the Department recommends the establishment of a single reporting system that generates minimum, comparable data. States or local governments may choose to add other elements for their own management purposes.

One alternative to a national reporting system is to have all 50 States establish their own reporting systems. There would be no guarantee of comparability of information across State lines. Let me take one example. Suppose, after the first year of the program, Massachusettes shows a placement rate of 50 percent, while Texas shows a 60 percent placement rate. On further investigation, however, we discover that over half of the participants in the Massachusettes program are high school dropouts, but only 10 percent of the participants in the Texas program are. The relative performance of the two States is quite different. In fact, Massachusettes may well have operated a more successful program than Texas. But Congress and the Administration would not be able to make this comparison unless both States were required to gather the information. About ten such characteristics have been identified that affect performance, and the Department is requiring that these be reported on a national basis.

Another equally serious concern over the lack of national reporting would be the difficulty to transfering information about successful programs across State lines. How would a program strategy tried in Massachusettes be transferred across the country to California, or even next door to Maine, if the local areas don't gather comparable data on the people they serve? We in the employment and training field would find ourselves without a common language, and without the ability to communicate and to learn from our successes and failures in a timely manner. That is no way to run a business--or a government program.

It is important to recognize that the reporting of client outcomes and characteristics is not an intrusion of the Federal Government into the process of planning and running job training programs. As noted earlier, one of the major changes from CETA to JTPA is JTPA's strong emphasis on outcomes, not process. To know how many people received jobs from the program, and their age, race, sex, or educational level, requires only after-the-fact reporting. Reporting does not direct what services should be provided. Reporting of outcomes, characteristics, and activities is fully consistent with JTPA's emphasis on results, because it lets Congress and the Administration--who are ultimately responsible for the expenditure of these tax dollars--know what return they are receiving on their investment.

The cost of a reporting system is also a concern. Here, too, the need for a nationally defined system is evident. Data collection systems are in place in over 80 percent of the local areas that will be "service delivery areas" under JTPA. This existing reporting system closely mirrors the reporting requirements spelled out by the Labor Department in the April 26th Federal Register in terms of the data elements it will gather, although reports are to be made far less frequently than were required under CETA. Drastically altering the current reporting system when so many other changes are occurring in the system would, in all likelihood, be more costly and timeconsuming than slightly modifying the existing system.

Further, once basic client eligibility information is gathered, reporting additional elements to the Federal level is not costly. At the State level, we are only talking about small incremental costs of reporting to the Department additional information over the "base"--information that all agree should be gathered anyway. It would be far less costeffective for each State or each local area to have to develop its own system--which, again, would lack transferability and interstate utility.

Finally, it is a truism that good management requires good information. The "information age" of efficient and inexpensive computers has arrived. Reporting is not--quite literally--the paperwork burden it was just a short time ago.

Performance Standards

National reporting along the lines of the Department's April 26th notice is necessary for us to be able to use the Department's approach to performance standards. As I noted earlier, the regression technique permits us to set standards objectively and to compare fairly the performance of different areas that enroll different types of participants. The Department has identified ten key characteristics, such as age, sex, and educational level, which have historically affected performance. Without national reporting of these characteristics, the regression technique could not be used.

National reporting based on sampling has been offered as one alternative to national reporting on all participants in the system. However, this does not alter the need for consistent gathering of consistently defined data for the purposes of good management. Furthermore, each State will have to collect the data from its local areas in order to measure local performance. The question then is whether the Department of Labor should collect from the

States information that they will already have, or whether the Department should set up a reporting system based on sampling. We believe that sampling would be more expensive than merely collecting the data the States will have have anyway, and that sampling would simply duplicate normal data gathering at the State and local levels. In any case, sampling should not be used as a replacement for consistently defined data on participant outcomes or characteristics.

PRELIMINARY RESULTS OF IMPLEMENTATION STUDY

We have been closely monitoring program and policy development issues surrounding the implementation of the Job Training Partnership Act since the law was signed last October. In order to provide information on the early implementation activities, the Commission contracted with MDC, Inc., to conduct an initial assessment of the States' efforts to assume their new role in the employment and training system. To gain further information as the transition unfolded, the Commission joined with the National Governors' Association in sponsoring a second assessment by MDC, Inc., of the transition in May and June of this year.

The first study was conducted during the earliest months of the transition from CETA to JTPA, November and December of 1982, and was widely disseminated early in 1983. We found that although there was a great deal of interest in the new Act on the part of the States, the situation was very much in flux, especially in the 17 States where new Governors had been elected but not yet inaugurated.

There was some doubt at that time as to whether the States would be able to meet the very tight timetables required in appointing new State Job Training Coordinating Councils, designating Service Delivery Areas, certifying Private Industry Councils, and generally setting up the administrative mechanisms necessary to make JTPA operational by October 1 of this year. The States expressed a strong desire to have the Department of Labor provide technical assistance to help them establish the new system.

The second assessment, which was recently completed by MDC, Inc., working with staff of the National Governors' Association, again focuses primarily on the States, although it included a few site visits to local areas. It found that the States have indeed been able to take the steps necessary to implement the law as required and that many have given special attention to ensuring that JTPA will be effective. The assessment also revealed that the Department has now provided assistance to the States in meeting the requirements of the Act, both through the use of its own staff and through technical assistance contracts with organizations representing the major actors in the new system--business, labor, and State and local governments.

Most of the information gathered in May and June relates to State activity, since most of the service delivery areas had only recently been designated, and private industry council certification was still in the very early stages. We do not expect to have a clear picture of the effectiveness of this new approach to Federal job training programs, such as the types of services to be offered or the number and types of participants to be served, for some months. I should also note that the assessment did not cover the District of Columbia, Puerto Rico, or the U.S. territories.

Our preliminary findings are:

- Most Governors have given a high priority to JTPA's implementation. There is a far greater involvement of ranking State officials under JTPA than under CETA--Governors, their special assistants, and cabinet-level officials. In four States (Indiana, Nevada, North Dakota, and Wisconsin), the day-to-day State JTPA administrators will report directly to the Governor. In 42 States, the administrator will be only one or two steps removed from the Governor, while in just three (California, Idaho, and Washington) will JTPA administration be four or more layers removed from the Governor.

- States are taking JTPA seriously. The Governors' statement of goals, objectives, and coordination criteria are being approached seriously and, in a number of areas, innovatively. Colorado, for example, is requiring that local areas coordinate their approaches to the private sector, while both Hawaii and Colorado are organizing cross-training of JTPA, welfare, and Employment Services staff. Two-thirds of the States responded that they are working on broader policy issues related to JTPA, such as its relationship to economic development and education programs.

- Business-level involvement at the State level appears to be greater under JTPA than CETA, as measured by private sector involvement in State Job Training Coordinating Councils, attendance at such meetings as JTPA training sessions, and cosponsorship of JTPA orientation and training sessions.

- In the area of local continuity from CETA to JTPA, there will be approximately 580 service delivery areas (not including those in the District of Columbia, Puerto Rico, and the U.S. territories). This is a net gain of about 20 percent over the 474 CETA prime sponsors in the 50 States. Twenty-seven States will have more service delivery areas than they had under CETA, while 11 will have fewer. About 40 percent (220) of the service delivery areas have exactly the same boundaries as existing CETA prime sponsors. Another 40 percent of the service delivery areas will have rearranged CETA prime sponsor boundaries. The remaining 20 percent (113) will cover jurisdictions that had no previous employment and training program administrative experience. Most of these are in rural areas previously administered by the States. For obvious reasons, it is here that the startup problems will be the greatest and where there is a good deal of concern.

- There appears to be considerable administrative continuity at the State level, with 38 States (of 47 reporting) using the same agency to administer JTPA as administer current State CETA activities. Only nine States have opted to move the administration of JTPA from the agency which administered CETA.

- Many local areas have done advance planning in anticipation of formal service delivery area designation. Indications are that initial services provided under JTPA will be very similar to those provided under CETA.

- Many of the members of the State Job Training Coordinating Councils are new. In 41 States less than 35 percent of the Council membership had been members of the CETA State Employment and Training Council or other related councils. In four States the entire membership was new. The actual role the State Councils will play in policy development will not be clear until later this year, as planning gets underway for the first full JTPA program year. However, most States (38) expected the Councils to play an important role in policy development. Many of the States (20) expected the Council to be an arbiter among parties in the system, and 34 expected the Council to act as an advocate for collaboration among agencies and programs.

- Most States and local areas still voiced serious concern about the quality of planning that could be accomplished during the short time--less than 4 months in some cases--between designating service delivery areas and approving local plans. Private industry councils must be appointed by local elected officials and certified by the Governor, PIC-local elected official agreements must be written, administrative units selected, staff hired, plans developed, and contracts negotiated. As such, there was a concern that planning for the nine-month period would be very tightly compressed and result in little programmatic change. The time that is available requires a greater focus on administration and governance than on program planning.

- The States were asked whether they had encountered or anticipated significant problems. Apart from timelines, 18 States said they did not anticipate significant problems in any area while 32 States indicated that they had problems in at least one area. Some of the areas in which problems were anticipated include financial management, participant reporting and management information systems, labor market information, the provision of training and technical assistance, and the handling of substate allocations.

- The States said they anticipated having some of their greatest difficulties with audit and debt collection under JTPA. Under CETA, a very detailed audit guide was available which provided definitions of allowable expenses and activities. States indicated that they want specific guidelines to protect them from unanticipated audit questions in the future.

- The States indicated that for the most part they plan to provide assistance to local areas in implementing JTPA, but their energies have been almost totally absorbed in meeting their own deadlines. Forty-seven said they were assisting the local areas in planning for the startup. The State JTPA office is working directly with associations of local administrators in 12 States. Most States indicated that assistance would be provided to private industry councils and local elected officials as well as to local administrative entities.

- Many States indicated there will be a continuing need for formal management assistance and staff development at the State and local levels after October 1st. While few States indicated that they had a system in place yet for providing continuing management and technical assistance and staff training, several were attempting to devise such systems.

SHORT-TERM AND LONG-TERM JTPA RESEARCH AND EVALUATION ISSUES

In closing, I would like to describe briefly some short- and long-term research and evaluation projects that the Commission will pursue in carrying out its mandate in JTPA.

Last October, shortly after JTPA was signed into law, we initiated a process which involved over 125 professionals in the field, including many Congressional staff and Department of Labor officials. This resulted in the identification of 12 short-term and 12 long-term issues for research related to JTPA.

There are two types of short-term issues. One is the change from CETA to JTPA. Here, we are attempting to provide early information to the new system on how to deal effectively with these changes. Almost all of these projects are underway, with the results due back by early October. For example, by looking at areas which have heavily involved the private sector or have already reduced or eliminated stipends, we will be able to provide guidance on what happens to client outcomes and characteristics if the private sector plays a larger role. What happens to clients when participant stipends are no longer available? Does the system serve a "less" disadvantaged client? What can a local program operator do to increase private sector participation or alleviate some of the problems caused by loss of stipends?

The second kind of short-term project is more technical and includes research in the area of performance standards, such as what are the best methods to gather data on welfare grant reductions or earnings gains. The Department of Labor has largely assumed responsibility for these projects.

Finally, we identified 12 long-term research issues, such as the net impact of the program on participants, the impact of the coordination requirements of JTPA on program operations, and the effect that gaining employment competencies has on youth employment. We will address these issues in fiscal years 1985 and 1986 after the program has been operational long enough to make valid evaluation judgments.

The Commission looks forward to reporting the results of these various studies as they are ready, and will share them with this Committee as soon as the information is available.

Conclusion

In conclusion, the Commission strongly reiterates its support for the Department of Labor's efforts to insure objective, effective performance standards and a complementary national reporting system as put forth in the April 26th Federal Register. These two systems are symbiotic and are critical to good performance, management, and oversight.

Further, we believe the Department of Labor, States and localities, and the various interest groups should be commended for the efforts put forth to date to implement the Job Training Partnership Act. There are problems, to be sure. Certainly, some of the biggest challenges are to come as administrative and organizational concerns must be translated into program results for participants. At this time, we do not see any problems that cannot be overcome by administrative action and a continued high level of commitment to success at the Federal, State and local levels.

Probably the most important conclusion of our recent assessment of implementation is that the nine-month period that begins on October 1st of this year should be considered by all of us as a continuation of the transition that started in October of last year. We need to have realistic expectations for that period of time.

The Commission will continue to monitor JTPA programs and policies, and we look forward to continuing to work with Congress and the Administration in this endeavor.

Thank you for the opportunity to present our testimony.

Mr. **FRANK**. Mr. McKernan.

Mr. **MCKERNAN**. Do you run into many situations where States have used what I gather is one of the changes in JTPA to redesignate SDA's through the State level rather than at the local level?

Ms. **HOGUE**. Well, the Governor does have the responsibility with the State coordinating council to designate service delivery areas. In a number of States, of course, there are certain areas that are under law required to be service delivery areas. In other States—I think Massachusetts, is an example, the Governor actually changed all the service delivery areas somewhat that he had authority over, in the balance of State areas, areas that were previously administered by the State under CETA, in many States those have now been broken up and are going to be administered locally so there is quite a change taking place in many States in terms of delivery area boundaries.

Mr. **MCKERNAN**. Just to followup for a moment, do you know whether many States are moving from those local areas that under CETA were designated as service delivery areas that are now being run from a State level? It is my understanding that under CETA there were certain programs that could be designated as primary service delivery areas but that the formula has been changed a little bit to give the Governor more authority to make decisions on whether those local areas will be primary SDA's or whether they will just be part of a State SDA.

I think that is what happened in Maine is why I am asking.

Ms. **HOGUE**. You have finally resolved that. Last I heard you were going to have two service delivery areas.

Mr. **MCKERNAN**. It has been resolved but not that way. That is not my district but it is a concern to them, I assure you. My district did just fine. We were required to be designated under JTPA.

So my understanding, and this all just broke the end of last week, is that in Maine, anyway, Cumberland County area is going to be an SDA and the whole rest of the State is going to be the other SDA which does not please the people in Penobscot County as you can imagine.

I wonder if you are finding those types of situations in other States?

Ms. HOGUE. In most areas we are finding that the SDA designation is being resolved amicably. As I said, part of the change is that, under CETA, an area of 100,000 population automatically qualified for designation as a prime sponsor. Under JTPA, that size has been increased to 200,000 so obviously people that fall in the middle then are open to be consolidated with other areas. Of course, one of the objectives of JTPA was to try to organize service delivery areas more on labor markets and in some cases, some areas which form labor markets had populations large enough to be qualified for separate prime sponsor under CETA.

There obviously are some areas in which friction is occurring but in general, throughout the country, we find that most areas, most States and local service delivery areas are able to resolve their problems amicably.

Mr. MCKERNAN. And are most of these problems being worked out on a time schedule that is going to allow this whole program to start on October 1?

Ms. HOGUE. Yes, I think what you are going to realistically see is that not too much has changed in that first nine months of the new Job Training Partnership Act from CETA in terms of programmatic activities because there just is not enough time to plan too much that is new. I think most areas are going to use that first 9 months to do good planning for the first full program year.

Mr. MCKERNAN. What happens to those areas where they don't get the transition that you talked about being more difficult at the State and local levels taken care of by October 1? Is there a gap or how does that work?

Ms. HOGUE. Well, that is a good question. I think probably the Labor Department would become the final arbitrator in that situation. As far as I know, there is not going to be any State that does not have those things resolved by that time. There may be a very short planning time for a local SDA, but as far as I know, there aren't any States that are not going to meet that.

Mr. MCKERNAN. Can a program continue as long as there has been a designation by the Governor as long as most of the rest of the program is just being started as long as the designation has taken place, even if the PIC isn't actually formed that doesn't jeopardize the program?

Mr. WALLACE. No. Under the law, I believe the PIC would have to be formed and certified and approved by the local elected officials before the funding could go to that local area. So what it may require is tentative approval of plans. This is something the department has done frequently in the past, and I imagine some States will adopt it, too—some kind of not full approval of plans but something between nonapproval and partial approval.

Mr. MCKERNAN. Have you talked at all with the Department of Labor on whether there are any contingencies such as this?

Ms. Hogue. No.

Mr. McKernan. This is something we could address with them?

Ms. Hogue. Yes. I think that would be a good idea.

Mr. McKernan. Briefly to your Texas/Massachusetts comparison. Under this regression analysis, do the standards also set parameters on exactly what types of training programs that the JTPA can be involved in? You use the example of all of the people not having high school graduation diplomas in Massachusetts. Is that type of thing permissible? Do the local areas have that kind of flexibility to go that far?

Ms. Hogue. To choose who they serve, yes. Within the eligibility criteria, they do have the flexibility to decide who they are going to serve. There is supposed to be a special emphasis on high school dropouts and on welfare recipients and 40 percent of the funds are supposed to be spent on youth in each area. But other than that there is latitude to select participants based on needs within local communities.

Mr. McKernan. That is what I was wondering. You could spend all of your funds on youth instead of just 40 percent? What about the displaced workers?

Ms. Hogue. That is a separate title. Technically, you could spend all of your funds on youth. Under CETA, you had to serve what was called significant segments of your eligible population so that if 20 percent of the eligible population in your community were youth and 80 percent were adults you had to serve about 20 percent of youth in CETA and 80 percent adults. That significant segment requirement has been dropped out of the Job Training Partnership Act so that there is more flexibility to pick and choose who you serve.

Realistically, I think most areas will continue to try to serve proportionately different groups within their communities who are eligible. And the planning process, because a whole variety of different groups have to comment on the plan, really provides the opportunity for various segments of the community to come forth and say, "We aren't getting our share of services." There are some checks and balances.

Mr. McKernan. So politically they are going to balance it so that everyone at least is getting some piece of the pie?

Ms. Hogue. That is right.

Mr. Frank. Ms. Hogue, I notice in your testimony the one thing that was underlined; the top of page 5, the need for the national reporting system. You "strongly supported, as the minimum, the reporting system recommended by the Department of Labor and published in the April 26 Federal Register and believe that consistently defined local information reported to the States is important to its long-term success." You stress that. Is there any reason to think that is in jeopardy now that the Department of Labor said it is going to do it?

Ms. Hogue. Well, I would like to think there was no reason to think that was in jeopardy. I think as we know, the Office of Management and Budget is concerned about this. They have, so far at least, informally been objecting to it and so I think the national reporting system could be considered in jeopardy.

Mr. **Frank**. And your view is that without this we really don't know what we are doing?

Ms. **Hogue**. Yes, absolutely.

Mr. **Frank**. We will not be able to design and monitor the system effectively.

Ms. **Hogue**. Yes. I should say it is not just my view. Our commission has talked about it on a number of occasions and they feel very strongly the same way.

Mr. **Frank**. I would certainly be disappointed if the Office of Management and Budget made it impossible for us to have the one tool that is essential to sensible management of this program. I don't understand how Members of Congress can be expected intelligently to legislate on this subject if we don't have these kinds of reporting systems.

You have made the point the Labor Department has managed to, I think fairly well, put a couple of things together. That is, there is nothing in the national reporting system that could be categorized as a rigid, inflexibile set of rules that will interfere with State and local flexibility.

Ms. **Hogue**. No, not in terms of running the programs. This is after-the-fact recording of information that they are going to need for their own management purposes and you are going to need.

Mr. **Frank**. Making sure that the information we get is consistent and usable and comparable from place to place.

Ms. **Hogue**. That is right.

Mr. **Frank**. I appreciate that. I think that is one of the things that the subcommittee will be very concerned to do.

Have there been for many of the potential participants, States and local people, any objections to a reporting system that you are aware of?

Ms. **Hogue**. Not that we have seen. In fact, we have seen quite the opposite. I am sure you will hear from the National Governors Association that Governors are very strongly in support of this. Local areas, the National Alliance of Business and the Chamber of Commerce will testify that business people want it. They think it is important.

Mr. **Frank**. So there is a consensus and they think it is a good idea?

Ms. **Hogue**. That is right. Yes.

Mr. **Frank**. Let me go back and say I certainly agree with you that this is not the time for us to be legislating further changes and there is a lot to be said for stability, but the issue of a national reporting system seems so important that if there were to be, in the teeth of this consensus, a decision by OMB, upheld in the White House, to veto it, would that seem to you, if we had a single legislative change and simply took the Labor Department's April 26 national reporting system and tacked it on as an amendment, would that seem to you a reasonable thing to do?

Ms. **Hogue**. It would. I must say I hate to see the act opened up. I think CETA was subject to a lot of instability and a lot of change in that sense but I think this is critical and if there were one change to be made and all else had failed I would say that that would be a critical change to have made.

Mr. **Frank**. I guess the consensus would exist for that.

I have one more question and you may or may not have addressed this. If it wasn't within your mandate, there is no problem. I don't ask you to answer it, but roughly what percentage of the people who were in need of the services of the JTPA are likely to get them at the current funding level?

Ms. **Hogue**. I can provide you some specifics on that. To take a guess, we have done some surveys of how many people were eligible and how many received services under CETA. It is quite a small percent even under CETA, even at the height of CETA funding.

Mr. **Frank**. Less than 25 percent of those who could benefit from the funding?

Ms. **Hogue**. Yes. We have just gotten some new statistics on that. I don't have them in front of me but I will be happy to provide them for you.

Mr. **Frank**. I appreciate that.

[The information follows:]

NATIONAL COMMISSION FOR EMPLOYMENT POLICY
1522 K Street, NW, Suite 300
Washington, D.C. 20005

(202) 724-1545

August 8, 1983

Honorable Barney Frank
House of Representatives
1317 Longworth Office Building
Washington, D.C. 20515

Dear Congressman Frank:

At the hearings on the information system for the Job Training Partnership Act (JTPA) you convened on July 12 and 14, you asked us to provide you with information regarding the number of JTPA-eligible persons compared with the number who would likely be served in JTPA's first year. The purpose of this letter is to provide you with that information.

Background

Eligibility for JTPA is somewhat different than under the Comprehensive Employment and Training Act (CETA).

Eligibility for CETA training (title II B) required that the individual be economically disadvantaged and unemployed, underemployed, or in-school. The CETA regulations define economically disadvantaged as being in a family that receives public assistance or whose income does not exceed 70 percent of the Lower Living Standard Income Level (LLSIL). The CETA classification of "unemployed" is broader than the conventional Bureau of Labor Statistics definition, since it includes institutionalized persons, persons with minimal earnings (under $30 in the last seven days) who were seeking and available for work, and persons whose families receive public assistance. Underemployment includes part-time workers seeking full-time jobs and full-time workers with low earnings (the same as for economically disadvantaged). The details of definitions of "family" and the delineation of items to be included in measuring income have important consequences for the determination of eligibility but are, we believe, beyond the scope of your immediate interest.

Table 2 presents estimates of 1980 eligibility rates and participation in CETA from a study prepared by Kalmann Rupp of Westat, Incorporated for the Commission's project on National Employment Policy and Older Americans. All of the available slots in the local programs are generally filled. From the table you can see that in 1980 there were approximately 20.9 million individuals 14-65 years of age who were eligible for CETA. Of these about 890,000 received services under CETA title II B. (This does not include the youth CETA title IV training programs or the CETA title VII private sector initiative programs.) Of course of those potentially eligible not all will want, need or be able to take advantage of the services available.

Under JTPA, eligibility only requires that a person be economically disadvantaged. As mentioned above, this differs from the eligibility requirement under CETA which required the person also to be unemployed, underemployed or in-school. This change increases the number and proportion of persons eligible for training. However, because persons not unemployed or underemployed are usually less interested in employment and training programs, the CETA definition is a good benchmark for estimating the number of persons eligible and potentially interested in JTPA training. Table 2 shows the affect of this eligibility change from CETA to JTPA by age group. The proportion of economically disadvantaged who would be eligible for JTPA are shown in Column 2, while the proportion eligible for CETA are listed in column 4. Using JTPA eligibility requirements, approximately 47 million persons 14 and over would have been eligible in 1980, but this would include a substantial number of economically disadvantaged individuals who are not seeking work or training.

Conclusion

Generally, this research shows that depending on the age group, between less than 1 percent and 7 percent of those eligible received training under CETA in 1980.

If you want additional information on these or related estimates, please call me or Steve Sandell of the Commission staff.

Sincerely,

Patricia W. Hogue

PATRICIA W. HOGUE
Director

Enclosures

Table 1

Eligibility and Participation by Age for CETA title IIB in 1980

Age	Eligible as a Percentage of Population in Age Group	Participants as a Percentage of Eligibles in Age Group	Number Eligible in Age Group	Number of Participants in Age Group
14 - 21	17.6	6.8	5,707,000	387,500
22 - 44	14.1	4.1	10,777,000	444,300
45 - 54	9.7	1.8	2,177,000	38,700
55 - 61	10.8	1.0	1,717,000	16,200
62 - 64	8.9	0.5	523,000	2,700
65 - 70	9.6	0.3	984,000	2,700
71 +	12.0	0.1	1,727,000	1,300
total 14+	13.3	3.8	23,612,000	893,400
total 45+	10.3	0.9	7,128,000	61,600
total 55+	10.7	0.5	4,951,000	22,900

SOURCE: "Participation of Older Workers in Employment and Training Programs and the Effectiveness of these Programs," by Kalman Rupp et. al., paper prepared for National Commission for Employment Policy.

Table 2

Economically Disadvantaged Status and Other CETA Title II-B Eligibility Conditions by Age

Estimated Proportion of U.S. Population

Age	Economically Disadvantaged	Unemployed or Underemployed or In-School	Both (i.e., CETA eligible)
14-21	23.5	66.5	17.6
22-44	19.7	28.9	14.1
45+	35.5	15.2	10.3

SOURCE: "Participation of Older Workers in Employment and Training Programs and the Effectiveness of these Programs," by Kalman Rupp et. al., paper prepared for National Commission for Employment Policy

Mr. **Frank**. We have been joined by Mr. Levine, Mr. Owens, and Mr. Spratt. Do you have any questions?

Mr. **Spratt**. No, thank you. I am sorry to be late and I have no questions.

Mr. **Frank**. Thank you very much.

Ms. **Hogue**. Thank you.

Mr. **Frank**. Next we will call together, promoting any inter-governmental harmony, Barry Van Lare, staff director of the Committee on Human Resources of the National Governors Association and Ray Holland, U.S. Conference of Mayors Employment and Training Council, and deputy director of the Mayor's Office of Employment and Training in San Francisco.

No one will infer anything from the fact that you are testifying together other than that we are kind of in a hurry this morning. Why don't we begin with Mr. Van Lare.

STATEMENT OF BARRY VAN LARE, STAFF DIRECTOR, HUMAN RESOURCES COMMITTEE, NATIONAL GOVERNORS' ASSOCIATION

Mr. **Van Lare**. Thank you, Mr. Chairman. I welcome the opportunity to be here and will let you benefit from one of the advantages of close cooperation between the Federal Government and the States by not repeating much of the information that Trish Hogue provided for you. We have worked with her on the survey and I think she has given a very good overview as to where the States are. I will leave it here in my formal testimony.

I do want to reiterate the fact that the new legislation does make major changes in both the Federal and State role and that the reallocation of responsibilities among the levels of government would really not be possible without full Federal cooperation. And I want to say that I think we are extremely fortunate that the Department of Labor has recognized those new State responsibilities and has acted to assist us in implementing them in a number of important ways including: a limited level of detail in Federal regulations; working closely with the States in the development of those regulations; and in assisting us and other organizations to provide technical assistance to the States and the service delivery areas.

We very much appreciate that cooperative approach.

The National Governors Association, I think, very much shares the concern with performance standards. We very strongly support national performance standards and have worked to see that they are a central element of the activity that is taking place at both the State and local level. We believe that the approach which was developed by the Department of Labor is an appropriate compromise between the need for national information and the importance of continued State flexibility.

We are concerned that OMB's reluctance to approve that approach may really jeopardize the potential utility of performance standards as a management tool and the Governors have written directly to Mr. Stockman urging his personal attention to this issue and support for those changes.

It is somewhat unusual for us to be arguing for national standards but we believe that the requirements and the procedures are necessary to make the system work and we are prepared to support those kinds of activities on the national level.

We recognize that the performance standards will require additional work over time as we get more experience with the program and as the nature of national issues and national concerns change. We would hope that as these changes take place we will be able to see a continuation of the consultative process that has actively involved the government, the private sector and the Federal Government in developing the standards and procedures currently before OMB.

I think it has been a productive activity. I think it is that consultation which has produced the uniform support that Ms. Hogue has spoken about. I think that is critical.

The States are concerned about a couple of other issues that I think may be of concern to the committee. I would like to mention then briefly.

One, we strongly supported the concept of advanced funding which was included in the JTPA. We are concerned that the Administration has not opted to seek the full use of that advanced funding and that its planning and allocation instructions are causing confusion and concern to the States. We think that the structure which provides clear advanced knowledge of funding levels is critical for the kind of planning that is necessary for the success of this program. Such advannce planning using experience from one period to do thoughtful planning for the next period, will allow us to avoid a series of short-term solutions and to proceed in a reasonable manner.

We are also concerned that there is a great deal of activity needed to develop State systems for managing the Job Training Partnership Act. While we are not starting from scratch, there is a lot of work that needs to be done and it is important that we have the capacity to share information among the States, among the service delivery areas about what has happened in the past, what is working, what the available opportunities are under this act.

We don't believe that this is best handled by Federal prescription. We think it is better handled by technical assistance and consultation among the States and we think that it is critical that we keep the capacity for information sharing and technical assistance.

I think we share the sense that this is not a time for additional legislation. The performance standards provide an effective tool, we believe, for judging what has happened. We are convinced, as we have looked at the States that, in fact, the Governors and their staffs, the State legislators and others are paying a considerable amount of attention both to the mechanics of the program and the opportunities that are made available to them. We really do believe that as we finish this initial transition period and move into the first phase of implementation that there is a significant opportunity for improving the programs.

We welcome the opportunity to work with the committee on identifying the areas where you may wish to provide oversight and gaining an understanding of the concerns you may have. As we share information with the States we can make them aware of those concerns and they can be prepared to respond to them over time. We think the current legislation provides a framework that is workable and we are anxious to proceed toward implementation.

Mr. **Frank**. Thank you.

[The prepared statement of Mr. Van Lare follows:]

STATEMENT OF
BARRY VAN LARE
STAFF DIRECTOR, HUMAN RESOURCES COMMITTEE
NATIONAL GOVERNORS' ASSOCIATION

MR. CHAIRMAN, AND MEMBERS OF THE COMMITTEE:

I WELCOME THE OPPORTUNITY TO APPEAR BEFORE YOU THIS MORNING ON BEHALF OF THE NATIONAL GOVERNORS' ASSOCIATION TO REPORT TO YOU ON THE STATES' PROGRESS IN IMPLEMENTING THE JOB TRAINING PARTNERSHIP ACT AND TO OFFER SOME OBSERVATIONS ABOUT THE CRITICAL NEEDS WE SEE FACING THE EMPLOYMENT AND TRAINING SYSTEM IN THE COMING YEAR.

AS YOU KNOW, THE STATES FOUGHT HARD FOR THE PASSAGE OF JTPA AND WERE INSTRUMENTAL --WE BELIEVE -- IN HELPING FORMULATE THE PARTNERSHIP BETWEEN PUBLIC AND PRIVATE INTERESTS AND DIFFERENT LEVELS OF GOVERNMENT WHICH CHARACTERIZES JTPA. IT IS THIS PARTNERSHIP CONCEPT, AND THE FUNCTIONAL DIVISION OF POLICY AND OPERATIONAL RESPONSIBILITY BETWEEN THE PARTNERS, WHICH OFFERS THE POTENTIAL FOR STRENGTHENING OUR NATION'S EMPLOYMENT AND TRAINING SYSTEM. THE NEW ACT PRESENTS THE STATES WITH MAJOR NEW CHALLENGES AND NEW RESPONSIBILITIES AND I WANT TO OUTLINE BRIEFLY HOW THE STATES ARE RESPONDING.

FIRST, HOWEVER, LET ME SAY A WORD ABOUT THE FEDERAL ROLE. THE JTPA ENVISIONS A MAJOR REALLOCATION OF RESPONSIBILITIES BETWEEN STATES AND THE FEDERAL GOVERNMENT. SUCH A REALLOCATION WOULD NOT BE POSSIBLE WITHOUT FULL FEDERAL COOPERATION. FORTUNATELY, THE

DEPARTMENT OF LABOR HAS RECOGNIZED THE STATES' NEW ROLE AND HAS ACTED TO ASSIST THEM IN SEVERAL IMPORTANT WAYS. THEY HAVE:

- EXERCISED JUDGEMENT IN THE LEVEL OF DETAIL IN FEDERAL REGULATION AND LEFT SIGNIFICANT AREAS OF INTERPRETATION TO THE STATES
- WORKED CLOSELY WITH THE STATES IN THE DEVELOPMENT OF REGULATIONS AND PROCEDURES AND RESPONDED THOUGHTFULLY TO PUBLIC COMMENT
- RECOGNIZED THE IMPORTANCE OF TECHNICAL ASSISTANCE AND PROVIDED NGA AND OTHER PUBLIC INTEREST GROUPS FUNDING TO PROVIDE SUCH ASSISTANCE

THE STATES APPRECIATE THIS COOPERATIVE APPROACH AND LOOK FORWARD TO A CONTINUING CLOSE WORKING RELATIONSHIP AS WE ENTER THE PROGRAM OPERATIONS PHASE.

NOW, AS TO THE STATUS OF STATE IMPLEMENTATION. OUR REVIEWS SHOW THAT IMPLEMENTATION OF JTPA IS PROCEEDING IN AN ORDERLY FASHION ACROSS THE NATION. ALL STATES NOW HAVE WORKING STATE JOB TRAINING COORDINATION COUNCILS (SJTCC). THESE COUNCILS, APPOINTED BY THE GOVERNORS, ARE NEWLY CREATED STATE INSTITUTIONS TO DEVELOP STATE-WIDE JOB-TRAINING POLICY AND MONITOR THE STATES' PROGRAMS. THE SJTCC

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IS RESPONSIBLE FOR RECOMMENDING TO THE GOVERNORS SERVICE DELIVERY AREAS WITHIN THE STATE. GOVERNORS HAVE MADE FINAL DESIGNATIONS OF THESE AREAS IN ALL BUT THREE JURISDICTIONS. IT NOW APPEARS THAT THERE WILL BE ABOUT 590 SERVICE DELIVERY AREAS UNDER JTPA. PROBABLY TWENTY-EIGHT STATES WILL HAVE MORE SERVICE DELIVERY AREAS THAN THERE WERE PRIME SPONSORS UNDER CETA. HOWEVER, IN MOST OF THESE STATES THE ADDITONAL AREAS WERE FORMERLY CONTRACTORS UNDER THE BALANCE -OF-STATE CETA PRIME SPONSOR. TWELVE STATES WILL HAVE FEWER SDA'S THAN PRIME SPONSORS AND TEN WILL HAVE THE SAME NUMBER.

ANOTHER CRITICAL ELEMENT OF THE JTPA STRUCTURE, THE PRIVATE INDUSTRY COUNCIL, IS NOW BEING PUT TOGETHER IN EACH SERVICE DELIVERY AREA. THE PICS, WHICH HAVE SUBSTANTIALLY MORE AUTHORITY UNDER JTPA THAN THEY HAD UNDER CETA, MUST BE CERTIFIED BY THE GOVERNOR BEFORE THEY CAN BEGIN FORMALLY WORKING WITH LOCAL GOVERNMENT OFFICIALS TO DEVELOP THE ADMINISTRATIVE STRUCTURE AND THE LOCAL PLAN. ABOUT 200 PICS IN 29 STATES HAVE ALREADY BEEN CERTIFIED AND ANOTHER 100 ARE BEING REVIEWED FOR CERTIFICATION NOW. SEVENTEEN STATES HAVE COMPLETED THE PROCESS. ALL IN ALL, OVER HALF OF THE ANTICIPATED SERVICE DELIVERY AREAS HAVE PRIVATE INDUSTRY COUNCILS READY TO WORK WITH LOCAL ELECTED OFFICIALS IN DESIGNATION OF THE LOCAL GRANT RECIPIENT AND ADMINISTRATIVE ENTITY. ABOUT FIFTY ADMINISTRATIVE ENTITIES HAVE ALREADY BEEN FORMALLY AGREED TO AND OTHERS WILL MOVE QUICKLY INTO PLACE AS THE REST OF THE PIC'S BECOME CERTIFIED.

ANOTHER CRITICAL IMPLEMENTATION ACTIVITY IS PLANNING FOR THE FIRST JTPA PROGRAM PERIOD BEGINNING OCTOBER 1, 1983. STATE-LEVEL PLANNING, AS EMBODIED IN THE GOVERNORS COORDINATION AND SPECIAL SERVICES PLAN, IS PRACTICALLY COMPLETED. THE LABOR DEPARTMENT IS REQUIRING THAT THESE PLANS BE SUBMITTED BY JULY 15. AS OF THE END OF JUNE, OVER HALF THE STATES (28) HAD COMPLETED THEIR PLANS AND FOUR-FIFTHS (44) HAD FINISHED THE DEVELOPMENT OF THE KEY INGREDIENTS OF THE PLAN: ESTABLISHING STATEWIDE GOALS AND OBJECTIVES AND CRITERIA FOR COORDINATING STATEWIDE SERVICES. STATES ARE NOW MEETING WITH THEIR LOCAL PARTNERS TO BEGIN DEVELOPMENT OF THE LOCAL JOB TRAINING PLANS. FIFTEEN STATES HAVE DEVELOPED PLANNING INSTRUCTIONS FOR LOCAL AREAS AND THE OTHERS ARE IN PROCESS.

THE LAST IMPLEMENTATION ACTIVITY I WOULD LIKE TO REVIEW, AND THE FOCUS OF THESE HEARINGS, IS THE WHOLE AREA OF MANAGEMENT SYSTEMS DEVELOPMENT. EVERY STATE IS ACUTELY AWARE OF THE NEED TO ESTABLISH SOUND MANAGEMENT SYSTEMS BOTH TO ADDRESS FEDERAL REQUIREMENTS REFLECTED PARTICULARLY IN SECTION 164 AND ELSEWHERE IN THE ACT AND TO ASSURE AN EFFECTIVE PROGRAM. THESE SYSTEMS INCLUDE:

- FINANCIAL MANAGEMENT
- MANAGEMENT INFORMATION
- LABOR MARKET INFORMATION
- TECHNICAL ASSISTANCE AND TRAINING
- PARTICIPANT TRACKING AND FOLLOW-UP
- MONITORING
- ELIGIBILITY VERIFICATION
- AUDIT AND DEBT COLLECTION
- PERFORMANCE STANDARDS
- PLAN REVIEW AND APPROVAL, AND
- RESOURCE ALLOCATION

SOME OF THESE SYSTEMS ARE NEW, WHILE OTHERS WILL BE BASED ON EXISTING SYSTEMS. IN EITHER EVENT, THE STATES MUST MOVE QUICKLY TO ASSURE THE NEEDED DEVELOPMENT AND MODIFICATIONS. SUCH ACTIONS ARE NOW UNDER WAY IN EVERY STATE.

WE AT NGA, WORKING WITH THE LABOR DEPARTMENT, HAVE DEVOTED SUBSTANTIAL TIME AND ENERGY TO THESE SYSTEM DEVELOPMENT ACTIVITIES, PARTICULARLY IN THE AREAS OF FINANCIAL MANAGEMENT AND MANAGEMENT INFORMATION. NUMEROUS CONFERENCES AND TRAINING SESSIONS HAVE BEEN HELD AND ARE CONTINUING. EACH STATE IS DEVELOPING INTERNAL ADMINISTRATIVE GUIDELINES TO ACCOMODATE JTPA TO EXISTING STATE LAW AND PROCEDURES. WE EXPECT ABOUT THIRTY-FIVE OF THE STATES TO MODIFY EXISTING STATE FINANCIAL AND MANAGEMENT INFORMATION SYSTEMS TO PROVIDE FOR THEIR MANAGEMENT NEEDS DURING THE FIRST NINE MONTHS OF JTPA. OTHER STATES ARE DEVELOPING NEW SYSTEMS TO PROVIDE BETTER INTEGRATION OF FINANCIAL AND PARTICIPANT DATA. SYSTEMS INTEGRATION ENCOMPASSING EDUCATION, TRAINING, EMPLOYMENT SERVICES AND OTHER STATE INSTITUTIONS IS ONE OF THE MANAGEMENT IMPROVEMENTS MADE POSSIBLE BY THE JTPA AND WE BELIEVE THAT NUMEROUS STATES WILL TAKE ADDITIONAL ADVANTAGE OF THAT POSSIBILITY OVER THE NEXT TWO TO THREE YEARS.

WHILE THE STATES ACTIVITIES ARE FOCUSED PRIMARILY ON ESTABLISHING INTERNAL STATE MANAGEMENT SYSTEMS AND WORKING OUT NEW STATE AND LOCAL AND PUBLIC AND PRIVATE RELATIONSHIPS TO MEET THEIR OWN JTPA

IMPLEMENTATION NEEDS, THEY ALSO RECOGNIZE THE NEED FOR MAINTAINING SOME UNIFYING ELEMENTS THAT ENABLE THE VARIOUS PARTNERS ACROSS STATES TO COMMUNICATE WITH EACH OTHER ABOUT THEIR SUCCESSES AND FAILURES AND ISSUES OF COMMON CONCERN. IN OUR VIEW A NATIONAL SYSTEM OF PERFORMANCE STANDARDS AS LEGISLATED BY CONGRESS CAN PROVIDE THE FRAMEWORK FOR THIS PURPOSE. IN ADDITION, THE FORWARD FUNDING PROVISIONS OF JTPA AND THE MAINTANANCE OF A STRONG INTERSTATE SUPPORT STRUCTURE WILL ENHANCE UNIFIED PLANNING AT THE STATE AND LOCAL LEVELS. I WOULD LIKE TO ADDRESS EACH OF THESE CONCERNS WITH YOU.

PERFORMANCE STANDARDS

AS YOU KNOW, NGA STRONGLY SUPPORTED NATIONAL PERFORMANCE STANDARDS IN THE JTPA AND HAS WORKED TO SEE THAT PERFORMANCE STANDARDS BECOME A CENTRAL ELEMENT IN THE STATE AND LOCAL MANAGEMENT PROCESSES. WE HAVE WORKED CLOSELY WITH THE DEPARTMENT OF LABOR IN COMMUNICATING THE IMPORTANCE AND POTENTIAL BENEFICIAL IMPACT OF PERFORMANCE STANDARDS THROUGH CONFERENCES AND WRITTEN MATERIALS. WE BELIEVE THAT THE APPROACH DEVELOPED BY DOL REPRESENTS AN APPROPRIATE COMPROMISE BETWEEN THE NEED FOR NATIONAL INFORMATION AND DESIRED STATE FLEXIBILITY. WE ARE CONCERNED THAT OMB'S RELUCTANCE TO APPROVE THIS APPROACH MAY JEOPARDIZE THE POTENTIAL UTILITY OF PERFORMANCE STANDARDS AS A MANAGEMENT TOOL AT THE STATE AND LOCAL LEVELS. THE STATES HAVE

URGED BUDGET DIRECTOR STOCKMAN TO MOVE QUICKLY TO END THE CURRENT IMPASSE.

YOU WILL RECOGNIZE THAT IT IS UNUSUAL FOR THE NGA TO ARGUE FOR EITHER NATIONAL REPORTING OR A NATIONALLY PRESCRIBED SET OF PROCEDURES. HOWEVER, WE BELIEVE THAT BOTH THE REPORTING REQUIREMENTS AND UNIFORM NATIONAL PROCEDURES FOR CALCULATING PERFORMANCE STANDARDS ARE, IN FACT, NECESSARY FOR THE SYSTEM TO BE FAIR AND MANAGEABLE. THESE PERFORMANCE STANDARDS AND PROCEDURES ARE THE JOINT PRODUCT OF THE VARIOUS JTPA PARTNERS AND WILL BE A VERY POSITIVE FEATURE OF JTPA.

THE INFORMATION PROPOSED TO BE REQUIRED BY THE FEDERAL GOVERNMENT IS LESS THAN THAT WHICH STATES AND SDA'S WILL HAVE TO COLLECT AND ANALYZE FOR THEIR OWN PURPOSES REGARDLESS OF FEDERAL REQUIREMENTS. THE FEDERAL DIRECTION IN THE DOL PROPOSAL ASSURES THAT THE DATA COLLECTED WILL BE SUFFICIENTLY COMPATIBLE BETWEEN STATES FOR PURPOSES OF CROSS-STATE COMPARISONS, NATIONAL AGGREGATION AND/OR ANALYSIS. SUCH DATA WILL ASSIST CONGRESS IN EVALUATING THE JTPA AND IT WILL BE OF VALUE TO INDIVIDUAL STATES AS WELL.

WE RECOGNIZE THAT THE PERFORMANCE STANDARDS WILL REQUIRE ADDITIONAL WORK OVER TIME. CRITICISM MAY BE LEVELED AT SOME OF THE SPECIFIC PROPOSED MEASURES AND THE LACK OF OTHERS, SUCH AS THOSE

DEALING WITH THE REDUCTION IN WELFARE DEPENDENCY. HOWEVER, WE BELIEVE THAT, ON THE WHOLE, THE PROPOSED PACKAGE IS THE MOST REASONABLE THAT CAN BE PUT TOGETHER AT THIS TIME GIVEN LIMITATIONS IN BASE LINE DATA ON JTPA PROGRAMS, AND THE COST AND TIME CONSTRAINTS UNDER WHICH THE JTPA SYSTEM WILL OPERATE. WE TRUST THAT THE OPEN AND PARTICIPATORY PROCESS THAT HAS BEEN PERSUED THUS FAR BY DOL WILL CONTINUE AND THAT OVER TIME FUTURE REFINEMENT IN THE PERFORMANCE STANDARDS CAN BE JOINTLY WORKED OUT.

FORWARD FUNDING

THE STATES STRONGLY SUPPORT THE ADVANCE FUNDING PROCEDURES ENACTED IN JTPA WHICH WERE DESIGNED TO HELP IN UNIFYING PLANNING AND OPERATIONS, PARTICULARLY AT THE LOCAL LEVEL. UNFORTUNATELY, THE ADMINISTRATION HAS NOT OPTED TO SEEK FULL USE OF ADVANCE FUNDING AND ITS PLANNING INSTRUCTIONS AND ALLOCATIONS WHICH REFLECT THIS DECISION ARE OF CONSIDERABLE CONCERN TO THE STATES. THE STATES ARE NOW BEING ASKED TO PREPARE A 21-MONTH PLAN FOR TITLE II WITH A TWELVE MONTH ALLOCATION, WHICH WOULD BECOME FIFTEEN MONTHS ACCORDING TO THE PRESIDENT'S BUDGET. FOR TITLE V, THE STATES ARE BEING ASKED TO PREPARE A TWELVE-MONTH PLAN WITH A TWELVE MONTH ALLOCATION. IN BOTH INSTANCES, THE ADMINISTRATION'S ACTIONS APPEAR INCONSISTENT WITH THE LAW AND WITH THE BUDGET RESOLUTION RECENTLY PASSED BY THE CONGRESS. THE SITUATION IS CONFUSING TO THE STATES AND NEEDLESSLY UNDERMINES THE UNIFIED PLANNING AND OPERATIONS STRUCTURES AT THE

LOCAL LEVEL THAT THE ACT INTENDED TO CREATE. OUR ATTEMPTS TO GET THE ADMINISTRATION TO CORRECT THIS SITUATION HAVE BEEN UNSUCCESSFUL. FORWARD FUNDING AS SPELLED IN THE ACT IS NEEDED BY THE STATES AND LOCALITIES AND WE HOPE THAT THE CONGRESS WILL ACT TO MEET THIS NEED.

INTERSTATE SUPPORT STRUCTURES

IT IS IMPORTANT TO EMPHASIZE THAT ALTHOUGH A GREAT DEAL OF ACTIVITY IS BEING DIRECTED AT CREATING NEW OR EXPANDED STATE SYSTEMS NEEDED FOR MANAGING JTPA, THE STATES AND LOCALITIES ARE NOT STARTING FROM SCRATCH. TO A VERY GREAT EXTENT STATES ARE ATTEMPTING TO BUILD ON EXISTING INSTITUTIONAL STRENGTHS AND CONSOLIDATE PERFORMANCE AND EFFICIENCY GAINS ACHIEVED UNDER CETA. THERE IS A CLEAR REALIZATION THAT THE SYSTEM AS A WHOLE MUST MAKE GOOD USE OF THE LESSONS LEARNED AND THE SYSTEM DEVELOPMENT INVESTMENTS MADE DURING THE LAST TEN YEARS IF THE GOALS OF JTPA ARE TO BE ACHIEVED.

WE DO NOT BELIEVE THAT THE JTPA GOALS ARE BEST SERVED BY FEDERAL PRESCRIPTIONS REGARDING ADMINISTRATIVE STRUCTURES OR FEDERALLY MANDATED PROCESSES OR PROCEDURES. THE STATES, HOWEVER, DO RECOGNIZE THE NEED TO CONSIDER NATIONAL NEEDS AND TO WORK TOGETHER TO AVOID DUPLICATION AND WASTE. AS A RESULT THEY ARE KEENLY INTERESTED IN OBTAINING INFORMATION ABOUT WHAT OTHER STATES ARE DOING AND WHAT OPTIONS ARE OPEN TO THEM IN MAKING THEIR OWN DECISIONS. DURING THIS TRANSITION PERIOD, NGA, USING FEDERAL

RESOURCES FROM DOL, HAS ATTEMPTED TO MEET THIS NEED THROUGH MEETINGS AND CONFERENCES FOCUSING ON SPECIFIC MANAGEMENT ISSUES, AND THROUGH THE DISSEMINATION OF A WIDE VARIETY OF OPTIONS PAPERS, STATE PRODUCTS AND OTHER MATERIALS OF INTEREST TO THE STATES. I HAVE BROUGHT ALONG FOR YOUR INFORMATION A LIST OF THE PRODUCTS DEVELOPED AND DISSEMINATED, AND CONFERENCES HELD UNDER OUR TECHNICAL ASSISTANCE PROGRAM.

WITH THE INCREASED MANAGEMENT RESPONSIBILITIES OF THE STATES INCLUDING EXPANDED STAFF DEVELOPMENT AND MANAGEMENT ASSISTANCE ACTIVITIES, THE NEED FOR INFORMATION SHARING BETWEEN STATES AND POTENTIALLY JOINT MULTI-STATE DEVELOPMENTAL ACTIVITIES WILL CONTINUE TO EXIST BEYOND INITIAL IMPLEMENTATION. WE BELIEVE THAT IT IS CRITICALLY IMPORTANT TO BEGIN TO EXPLORE OPTIONS ON HOW SUCH INTERSTATE SUPPORT STRUCTURES CAN BE MOST EFFECTIVELY AND EFFICIENTLY SUSTAINED OVER TIME.

IN CONCLUSION LET ME EMPHASIZE THAT THE PROCESS OF IMPLEMENTATION IS IN FULL SWING THROUGHOUT THE NATION. AS INDICATED PREVIOUSLY THE TRANSITION PROCESS APPEARS TO BE PROCEEDING IN AN ORDERLY AND DELIBERATE MANNER. SOME CHANGES WILL, THEREFORE, BE IMPLEMENTED IMMEDIATELY WHILE OTHERS WILL BE PHASED IN DURING THE NINE MONTH TRANSITION PROGRAM YEAR. ONE OF THE MAJOR ADVANTAGES OF THE LARGER STATE ROLE IS THIS CONTINUING OPPORTUNITY FOR

IMPROVEMENT AND CHANGE AS WE GATHER GREATER IMPLEMENTATION EXPERIENCE.

WE BELIEVE THIS THOUGHTFUL TRANSITION IS A WELCOME SIGN OF THE MATURITY AND INCREASING STABILITY OF THE TRAINING SYSTEM. WE THINK JTPA IS A GOOD LAW AND ONE THAT PROVIDES THE APPROPRIATE FRAMEWORK FOR POSITIVE CHANGES IN THE PROGRAM. WE THINK IT IS IMPORTANT THAT IT BE GIVEN AN ADEQUATE OPPORTUNITY TO PROVE ITS EFFECTIVENESS. WHILE WE RECOGNIZE THE VERY IMPORTANT CONGRESSIONAL INTEREST IN THESE PROGRAMS AND WE ARE PLEASED THAT, THROUGH THESE HEARINGS, THE DELIVERY SYSTEM AT ALL LEVELS WILL HAVE AN EARLY OPPORTUNITY TO GAIN A BETTER UNDERSTANDING OF THOSE CONCERNS, HOPE THAT CONGRESS WILL NOT, HOWEVER, SEEK TO MAKE ADDITIONAL CHANGES PRIOR TO IMPLEMENTATION. INSTEAD, WE WOULD HOPE THAT STATES AND SDA'S WILL BE ABLE TO USE THE INFORMATION AND CONCERNS IDENTIFIED AT THESE HEARINGS AS THEY PLAN THEIR OWN RESEARCH ACTIVITIES AND MANAGEMENT INFORMATION AND RECORD KEEPING SYSTEMS. WE ARE CONFIDENT THAT SUCH AN APPROACH CAN MEET NATIONAL NEEDS WITHOUT LIMITING THE FLEXIBILITY NEEDED FOR PROGRAM IMPROVEMENT.

THE STATES AND THE REST OF THE SERVICE DELIVERY SYSTEM ARE FULLY COMMITTED TO MAKING THE JTPA WORK. HOWEVER, WE NEED A DEGREE OF STABILITY AND A REASONABLE TIME TO DEMONSTRATE THE WORKABILITY OF THE NEW MANAGEMENT SYSTEM. WHILE WE SEE NO NEED FOR ADDITIONAL LEGISLATIVE ACTION AT THIS TIME, WE ARE PREPARED TO WORK CLOSELY WITH THE CONGRESS AND THE DEPARTMENT OF LABOR TO ASSURE THAT THESE NEW SYSTEMS CAN BE RESPONSIVE TO TO NATIONAL NEEDS.

STATE CAPACITY BUILDING FOR IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

The purpose of this contract is to assist states during the period of transition from CETA to the Job Training Partnership Act in developing policies, procedures and administrative arrangements necessary for carrying out the intent of the legislation. Assistance is directed at both short-term needs leading to implementation on October 1, 1983 and longer-term systems development and policy issues.

Contract Period: 1/1/83 - 12/31/83

I. CONFERENCES AND MEETINGS COSPONSORED WITH DOL STATUS OF 7/7/83

1. Conference on State Management Information Systems Under JTPA

Houston, Texas	March 9-11, 1983

2. Conferences for State and Local Practioners on Financial Management Under JTPA

Scottsdale, Arizona	May 10-12, 1983
Atlanta, Georgia	May 18-20, 1983

3. Conferences for State and Local Practioners on Performance Standards under JTPA,

Washington, DC	May 26-27, 1983
Kansas City, Missouri	June 1-2, 1983
San Diego, California	June 8-9, 1983

4. Workshops on Employment and Training Programs for Welfare Recipients

Washington, DC	May 4-5, 1983
Chicago, Illinois	May 25-26, 1983
Sacramento, California	June 27-28, 1983
Denver, Colorado	June 29-30, 1983

5. State Liaison Meetings:

Washington, D.C.	January 18-19, 1983 February 9-9, 1983 April 19-21, 1983

II PUBLICATIONS

NGA PUBLICATIONS

Policy Papers

1. State Job Training Coordinating Council Handbook on Implementing the Job Training Partnership Act.
2. The Coordination Linchpin: Making Sense of the Coordination Mandates Under the Job Training Partnership Act.
3. An Organizational Option for State Administration of JTPA
4. Managing Information at the State Level: Opportunity and Challenge
5. Financial Considerations For Implementation of the Job Training Partnership Act
6. Coordinating Job Training and Public Assistance Functions
7. Establishing A System for Developing and Documenting Youth Competencies: Policy and Program Considerations of Organization and Implementation

Issue Papers

1. Managing the State System
2. Appointing the State Job Training Coordinating Council
3. Designating the Substate Service Delivery Areas
4. Business Involvement in the Job Training Partnership Act
5. Opportunities for Coordinating Systems
6. Integrating Job Training & Labor Exchange Functions
7. State Labor Market Information Activities
8. Conference Proceedings on State Management Information Systems under JTPA: Major Focus and Issues of Concern - March 9-11,1983.

Materials Disseminated Through The Information Exchange

Information Briefs

1. Background Analysis of Opportunities for Cooperation Under the Job Training Partnership Act - Southern Growth Policy Board
2. Economic Development & Dislocated Workers - California
3. Establishing Private Industry Councils & PIC/LEO Planning - Massachusetts
4. PIC and SDA Application Forms - Arizona
5. Phone Survey of States Conducted in Late November and Early December - MDC, Inc.
6. LMI Data Requirements - Arizona
7. Executive Orders on Labor Market Information - Maine, New Jersey and Idaho
8. SDA Designation Process - Wisconsin
9. Three Items of Interest From States on SDA Designation and Interagency Planning - Kansas, Indiana and Wisconsin
10. Tracking Progress in the Implementation of JTPA Through a Bi-Weekly Survey of States - Department of Labor, Washington, DC
11. Data Management Considerations with the Job Training Partnership Act - New York State Department of Social Services
12. DOL's Bi-Weekly Status Reports on JTPA Implementation.
13. Displaced Workers: New Options for Changing Economy - National Commission on Employment Policy
14. The Implementation of A State Response in Preparation for Industrial Shifts-Arizona and Report and Recommendations of the Governors' Task Force on Retraining/Dislocated Workers-Iowa
15. "Special Report on Statistics Related to the Budget of the U.S. Government FY 1984"
16. Criteria For Coordinaton of Employment and Training and Related Programs at State and Local Government Levels - Colorado
17. Planning and the Job Training Partnership Act - Analysis and Recommendations - Wisconsin
18. A Technical Assistance Guide for Private Industry Councils and Local Elected Officials - Iowa

Technical Briefs

1. Conflict of Interest - Georgia
2. Educational Reference Citations - Washington State
3. JTPA Transition Calendar - Washington State
4. Liability and Grant Administration Under the Job Training Partnership Act - Massachusetts
5. There is no Technical Brief #5, the number was omitted by mistake.
6. General Overview of Performance Contracting Systems - Illinois
7. Considerations for JTPA Performance Standards: The Social Services Perspective - New York
8. Common Intake Form Implemented In Maine

Mr. FRANK. Mr. Holland.

STATEMENT OF RAYMOND R. HOLLAND, PRESIDENT, EMPLOYMENT AND TRAINING COUNCIL, U.S. CONFERENCE OF MAYORS

Mr. HOLLAND. I would like to follow on with the comments that have already been made to you. I think we are well aware that the transition from one program to another is always difficult. In the case of the transition from CETA to JTPA at the local level, it is especially difficult because not only do we have the transformation of the institutions taking place, the changes, some of which have been completed in certain areas and other cases, they have not been, we are also having to develop a whole new system of communication as to with whom we communicate for what particular kind of problem.

Right now, some local programs are operating as if they were entirely CETA, in some cases they are half CETA and half JTPA, and in some local areas they have already been changed over entirely into JTPA programs.

An interesting situation occurs when a local program administrator has a problem. If the problem is CETA in nature, he or she asks the Labor Department. If it is JTPA in nature, he or she is required now to ask the Governor's staff or the staff of the State agency assigned to JTPA programs.

It is a period of substantial confusion as I am sure you can appreciate and one of the things that is probably the most critical issue we are facing in this next year in terms of planning JTPA at the local level is how to deal with the new budget limitations, specifically with regard to the maximum of 70 percent that must be spent on training and the maxima of 15 percent each permitted for on participant support and for administration.

The administrative limitation is one of the big problems in putting together a program for next year. Being able to set with some certainty—once you have figured out who you are going to be working for as a local program administrator and many of us don't know yet who, in October, the employer will be—a system that will reflect that 15 percent administrative budget is very difficult.

A major portion of that budget will go into the operation of data systems and the establishment of a program that will meet some kind of a performance standards.

At the present time, we—like everybody else in the country—have the April 26 proposal from the Labor Department. As it gets down to the local level, it goes through the State. The State has a number of alternatives to take. No. 1, the State's staff can go on pure faith that what was proposed on April 26 will eventually be approved as is and say "That is the way we are going," and pass that on to the local administrators or they can say, "Gee, something might change," and what they can do is assume:

> Well, to be certain, let's double or triple the volume of our data systems, require that of local programs and hope that at least a third or a half of what we have required will, in fact, be ultimately what is required federally.

We are facing in that area a particular problem of major consequences because data systems are perhaps one of our most expensive pieces of the administrative budget which, as you realize, I think is 5 percent lower than it has been in previous years. We have to begin committing money very shortly in executing contracts to operate those systems.

If, in fact, the State is operating on the basis system of, "Well, let's play it safe and require 300 percent of what we think will ultimately be required in order to make sure that we cover all our bases," you are going to be putting a lot of money out on a stick just for that data system and not really be dealing with some of the other important management problems in order to assure that you have something there that will give you the information you want.

Whatever is required statewide or locally at this time may ultimately prove not to be what is consistent with that of another State. There are certain problems we have right now in the data systems, such as definitions of basic data terms, which already we see are going to be defined differently from State to State.

From a local perspective, as my colleague here indicated, it is somewhat odd for the State to be advocating a set of national performance standards in a national data system. We at the local level would also endorse that position and that it might be even more surprising.

We need a data system that has some Federal uniformity and consistency to it. We need some performance standards and we need them now because we are in the process of executing those contracts.

I would be open for any questions.

Mr. **Frank**. Thank you.

[The prepared statement of Mr. Holland follows:]

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JULY 12, 1983
TESTIMONY OF RAYMOND R. HOLLAND
ON BEHALF OF
THE U.S. CONFERENCE OF MAYORS
BEFORE THE
GOVERNMENT OPERATIONS COMMITTEE,
SUBCOMMITTEE ON MANPOWER AND HOUSING,
U.S. HOUSE OF REPRESENTATIVES

ASSESSING THE IMPACTS OF THE NEW PERFORMANCE STANDARDS CONTAINED IN THE JOB TRAINING PARTNERSHIP ACT

Thank you for inviting me to meet with you today. My name is Raymond Holland, I am the Assistant Director for the Mayor's Office of Employment and Training for the City and County of San Francisco, and, today, I am representing the United States Conference of Mayors as President of its Employment and Training Council.

I have been asked to provide you with some assessment information, from the perspective of an administrator of local employment and training programs, on the impact of the new program performance standards contained in the Job Training Partnership Act (JTPA).

As you are aware, Section 181 of the Act provided that the current 1983 fiscal year could be used as a transition period, during which local programs could be gradually changed from reflecting CETA requirements to programs reflecting JTPA requirements.

During this period some local programs have continued to be operated exactly as they were under the CETA requirements. Other local programs have been partially restructured and redirected to incorporate some of the requirements of both the CETA and of the JTPA. And, in a few cases, local programs have been completely reconstituted to reflect all of the JTPA requirements, with few, if any, vestiges remaining of the CETA requirements.

As would be expected from so many locally-varying experiences, it is impossible even to venture some generalizations about what kinds of actual impacts have been made on all local programs, and on their performance results, by the new JTPA standards.

A further complication in this information-gathering process is occurring because of the rather-abrupt and significant change which has occurred in the communication process between the different levels of government.

Under the CETA, the U.S. Department of Labor still provides all of the administrative interpretations for that law and communicates them directly to the administrators of local programs.

On the other hand, under the JTPA the Department of Labor has intentionally limited or eliminated many of its roles as the administrative authority to interpret all or most of that law. It has, instead, delegated vast amounts of that authority to the Governors.

Thus, a local program administrator now finds him or herself asking the staff of the Labor department for administrative guidance on the CETA aspects of current programs and being asked to ask the staff of the Governor's Office (or of some other state agency, if designated) for administrative guidance on the JTPA aspects of those same programs, for which detailed planning for their continuation is now taking place in most local areas.

In addition, if the Governor has already designated "service delivery areas", if he has already certified the "private industry council" which has been appointed, and if that council and the "chief local elected official(s)" have already executed the agreement required by section 103(b) of the Act, the local program administrator may know now if s/he will be in that same or similar capacity in October of this year and by whom s/he will be employed. Unfortunately, as of this date, all three conditions have been completed in only a few local areas of the country and, in at least one state, none of those three conditions has been completed.

Because of the current, close inter-relationship between CETA and JTPA programs, this has led to some understandable confusion and inaction in various locales, especially when an issue cannot be clearly characterized as being "purely-CETA" or "purely-JTPA" in nature. In many cases, it is not yet clear where the administrative authority rests.

For example, for both CETA and JTPA programs, a person must be "economically disadvantaged" in order to be eligible to be enrolled in the programs. The definition of the term in both pieces of legislation varies little, if at all. It is based, in part, on certain, authorized, maximum family income values which vary both by the size of the family and by the local area of residence.

Under CETA, the definition for the terms "family" and "family income" and the specification of the maximum family income values for different sizes of families were all issued by the Department of Labor for every local area.

Under JTPA, the Secretary delegated the authority and responsibility for defining the terms "family" and "family income" to the Governors. In all cases, Governors have not yet had sufficient opportunity to promulgate those definitions but, by October 1st of this year, some current participants in employment and training programs may have to qualify under them (whatever they may be).

Under JTPA, the Secretary retained the authority, along with the Office of Management and Budget, to determine the maximum family income values for all local areas and, for the 1983-1984 programs, has already done so and published them.

Those criteria, which once varied by as much as 25% from one local area of the country to another (based upon the varying costs of living), have now been redetermined, apparently because of budget reductions in the U.S. Bureau of Labor Statistics, so that in a few years there will no longer be any variances from locality-to-locality.

These two changes in participant eligibility criteria are bound to have some significant effects on who gets enrolled into the JTPA programs (as specified in Sections 141(a) and 203 of the Act). Unfortunately, insufficient information is now available with which to assess this impact nationally or, more immediately and (for current participants) more importantly, locally.

Other factors in the JTPA Legislation which will eventually have significant impacts on the resulting performance of employment and training programs are the performance standards specified in Section 106 of the legislation and the limitations of certain costs specified in Section 108.

Many CETA prime sponsors (e.g., the City and County of San Francisco) have been systematically collecting and compiling all of the performance indicator data specified in Section 106(b)(1) of the Act and, with respect to some of those performance indicators, all prime sponsors have had to conform to federally-prescribed performance standards.

Administrators of local CETA programs have frequently had to engage in difficult and prolonged negotiations of these standards with the Regional Offices of the Labor Department before obtaining approvals of those CETA plans.

Unfortunately, to my knowledge, these negotiated local CETA program performance standards have never been compiled to represent a set of national standards and cogently compared with the national performance results.

Nevertheless, the local standards have served a very useful purpose in "driving" most of the local program designs in the directions generally embodied by the national JTPA performance standards.

In late-April the Department of Labor formally proposed two sets (one for the nine months of 1983-1984 and one for the bi-annual periods thereafter) of national JTPA performance standards with provisions permitting, but not requiring, the Governors to adjust those national standards to reflect more accurately the peculiar circumstances of each local area and of the local program designs selected. Presumably, the Governors' staffs would adjust these standards to local conditions through the process of negotiating each local program plan.

To the best of my knowledge, the Office of Management and Budget has not yet approved the release of these proposed standards as final rules. Nor has the proposed data system to be promulgated along with the standards been approved.

Because of the lack of truly comparable national standards and of national performance results, because of the change in sequence (i.e., from local-to-national to national-to-local standards) by which these standards will be derived, and because of the different cast of characters which will negotiate their final local and statewide values, it is not possible to predict with any certainty what will occur or when that will occur under the JTPA.

In addition, and more importantly, there is not yet any federally-required comprehensive data system which will provide performance data which are consistent nationwide and which will be comparable to these national standards. As long as uniform federal definitions of some key data terms are not required federally, there may never be any comprehensive performance data on JTPA programs which are consistent nationwide.

We need to have a simple, comprehensive, uniform data system and a clear set of national performance standards. Its basic requirements need to be established at the federal level as soon as possible so that states and localities can design, develop, and implement those systems by October 1st. Today is already "too late"!

At this time, the one set of factors which will probably have the greatest influence on the initial performance results (and perhaps standards) obtained for JTPA programs are the costs and budget limitations contained in Sections 108 and 203 of the Act and the amounts of JTPA monies projected to be available for the nine months of 1983-1984.

At present, the JTPA budget planning estimates being used are derived from the President's budget for Fiscal Year 1984. They are somewhat lower than were the comparable appropriations for CETA programs in Fiscal Year 1983.

So far, the Department of Labor has allocated the twelve-month amounts budgeted for JTPA to all of the fifty states and seven territories by the formula contained in Section 201 of the Act.

Governors have been instructed to reallocate 78% of those amounts to all of the substate areas within their jurisdictions by the formula contained in Section 202 of the Act.

Some governors have informed their substate areas what their twelve-month budget planning estimates are; other governors have only released budget estimates for nine months worth of programs. These inconsistencies between states are perplexing, to say the least.

Some substate areas have received JTPA budget planning estimates which represent budget reductions of fifty percent or more compared to the amounts received for similar periods under CETA. Other substate areas have been notified that there will be slight increases in the amounts of JTPA monies they will receive compared to the amounts of CETA monies received for a comparable period in the current year.

These differences are also puzzling, as are the apparently-different trends which exist when examined by some of the different states. The possible reasons for some of these significant differences could be the absence of the "hold-harmless" factor from the JTPA formula, basic changes in the JTPA formula from that which existed under CETA, or the fact that the states now have to rely solely upon their own unemployment data to be applied to the JTPA formula whereas, under CETA, all data applied to that formula were first reviewed by the Department of Labor, before being applied.

Obviously, we cannot ascertain the reasons for these differences and we are not now suggesting any federal action in this regard except possibly in the area of extrapolating and summarizing the experiences of all fifty states so that there is a consistent basis for analyzing those differences.

Whatever the amounts of the local JTPA budget planning estimates are, the most prevalent factor in developing the local JTPA plans and performance standards for the nine-months of 1983-1984 is, in most cases, the new limitations on how those monies may be budgeted.

The lower administrative costs rate of 15% is presenting problems in almost all localities and, if the overall budget estimate represents a substantial reduction, it can appear to be devastating. Nevertheless, creative ways have been identified for reducing the local administrative costs rate to 15% or less subject to additional administrative responsibilities which are imposed upon local program administrators by the federal or state governments but which have not yet been communicated to local administrators.

The most intractable, immediate JTPA planning problem at present seems to be that which is presented by the convergence of the extreme limitations in "needs-based payments" in Section 108 of the Act and of the admonition to continue to design programs for those "most in need" in Section 141(a). The pressure to design programs which focus on enrolling only those JTPA-eligibles who are not as "needy" as are others is intense. Even though this is not a formal, JTPA performance standard, it is a standard. I predict that this standard will undergo the most significant, immediate change.

The current "buzzword" for JTPA program planners is the "fixed unit price agreement" which, fortuitously, is permitted in Section 204(28) of the Act.

Its advantages are that it allows some of the more-problematic budget limitations in the Act to be set aside and, by restricting full payment under contracts until full performance has been achieved, it provides increased assurances that planned performance will be met or exceeded.

Its disadvantages are that (despite the permissibility of these agreements under CETA) this form of agreement is, for most program planners, administrators, and service providers an entirely new approach and for service providers which have marginal cash flow conditions (i.e., most "community-based, non-profit organizations"), the fixed unit price contract is very threatening.

On informal bases, substantial amounts of technical information in these regards are being exchanged and shared between local program administrators and planners and most of these problems, we are confident, will be resolved satisfactorily.

In the meantime, the Department of Labor personnel are to be commended for their consistency of decision-making, once administrative policies have been established, and for their abilities to meet all of the incredible deadlines, once set.

At this particular moment, the parties meriting the most sympathy and support are the Governors and their staffs, who must create the working environments to set all of this in motion within the next three months. The cumulative effects of not only the added administrative responsibilities for the Governors and for their staffs but also of the "process issues" which sections 101 through 104 of the Act require be resolved first, are truly formidable.

I thank you for your patience in listening to my litany and I would be happy to attempt to answer any questions you might have.

Mr. FRANK. Mr. McKernan.

Mr. MCKERNAN. Let me just followup on that. Could you tell me why you need to double or triple your data system? I don't quite understand the reason for that.

Mr. HOLLAND. Well, the States, and I think particularly the staffs of the Governors or State agencies administering the program, are in the position of being between the Federal Government and local program administrators like me. They are not quite sure what they are going to have to live with come October 1 in terms of both data systems and performance standards and they have to look at it from basically three perspectives: What is the Federal Government going to want, first. Second, what is the Governor and the State legislature going to want. And third—I am telling you this is the position our staff has taken so far—what are we going to need locally?

We call the data systems local management tools. As a local manager, I am going to say I don't care what the Federal or State Government is going to want. We need information to manage the programs locally and we haven't seen that concern evidenced yet. That could perhaps be the normal reaction of a State in dealing with its uncertainties but we—at the local level—have to have a system in place from the start in order to know what we are doing, in order to record what we have done and in order to support what we have done at the end of the transition period, at the end of the first biannual period and so forth. The money has to be committed upfront.

Mr. **McKernan**. Let me ask you to comment on the rumors as to what changes might be made in the standards of the April 26 regulations.

Mr. **Holland**. I haven't heard of any rumors in particular.

Mr. **Van Lare**. I have not either.

Mr. **McKernan**. Is there this concern then as to whether those will become the regulations and your concern about the data systems?

Mr. **Van Lare**. The concern is that it is July 12 and there has not been OMB action. There is also some indication in talking at the staff level that there is concern in OMB about endorsing and supporting a new set of national reporting standards because it is not consistent with their current approach to simplification and reduction of requirements. We have been saying basically that "These reporting requirements and performance standards are important, so OMB can afford to depart from your principle and meet this need.

We have not heard of the specific approach that they may take. I suppose there are alternatives ranging from total rejection to a somewhat more limited system, but I don't know what they are.

Mr. **McKernan**. Let me follow up on that. The rumor is that OMB isn't thrilled with the idea of national standards. Is that what you are saying?

Mr. **Holland**. Well, I hate to infer——

Mr. **McKernan**. We are dealing with rumors now, so it doesn't really matter.

Mr. **Holland**. What I understand OMB's primary concern to be is with regard to paperwork and how much is needed to produce it. As I indicated to you, in my particular State, the concern of OMB has produced the opposite result that the State has, in fact, quadrupled or tripled the data reporting requirements in order, No. 1, to cover itself in the future should there be something different than what they are anticipating and it is not only that. Also the States have their own agenda. They have their own State legislatures and our legislature in California has raised substantial issues that differ slightly from those of the Federal Government. They want to see their issues covered. And we haven't even dealt with the fact that we have local legislatures, local elected officials and private industry councils that have their agenda.

What we should do is establish data systems based upon what the policy questions and management issues are. And what we need is to have some direction from the Federal Government about what its primary concerns are out of this program, what is expected of it and what it wants to insure gets covered. If we don't have that, we tend to go to the opposite direction and make sure you expand the data requirements above what is normally required in order to cover any contingency one thinks might arise.

Mr. **McKernan**. So that the concern with OMB's perceived problems, at least with the standards, is the paperwork aspect of it, not the substantive standards themselves?

Mr. **Holland**. That is my guess.

Mr. **Van Lare**. I really don't have access to what they really are raising at the moment.

Mr. McKERNAN. In talking about forward funding, do you want to explain that a little bit more about what the problem is and what the Congress can do about it if that was mostly the intent for something that is not being carried out?

Mr. VAN LARE. Yes. The basic concept is to make an appropriations decision a full year in advance so that the States and localities will know how much money is going to be available. It is my understanding that the budget resolutions provide for full forward funding and what we would like to see is the Congress act in that manner and provide it.

Mr. McKERNAN. Do you have any reason to think that Congress isn't going to act in that manner if it was included in the budget resolution?

Mr. VAN LARE. I would hope that is an indication of what the Congress would do.

Mr. McKERNAN. You said that you don't want to see any changes really in JTPA before it is implemented. I gather from that then that the type of interstate cooperation and structures that you are talking about would not require any congressional action. Would you just explain to me what you are talking about on that?

Mr. VAN LARE. I think we are talking about several different things. One, there is a fair amount of activity in that area that States can do themselves, and in fact will do, both through their associations and through efforts they support out of their own administrative funds. Second there are also in place now a series of technical assistance contracts with the Department of Labor which largely continue through the first of the year. We think that having these has been very helpful to facilitating the kind of communication I spoke of.

Attached to my testimony is an example of some of the things that have been done by NGA.

I think the third area is the need for a continued recognition of the importance of Federal support for the creation through the Federal Government's own technical assistance funds of an ongoing capacity to deal with the technical assistance tracking needs of the system. This can be accomplished in different ways that through a series of regional institutes or national technical assistance. The important thing is that there should be a recognition that the change in the focus of the Federal role does not eliminate totally the need for a Federal concern with technical assistance.

We believe that the ability to do that is present within the existing statute and that it does not require legislation. This is an issue that we are actively pursuing with the Department of Labor.

Mr. McKERNAN. Is a national data reporting system anything that could also help States to have access to this kind of national data? Do you know if that is envisioned to see what other States are doing?

Mr. VAN LARE. The States like almost any political entity tend to look at themselves compared to others to evaluate how they are doing compared to other people and identify areas where they might want to explore new approaches. Data as to who is being served, how the program is working, how program variations are affecting outcomes is something that States will want to share among themselves and will find useful for purposes other than just national evaluation.

Mr. **McKernan**. They wouldn't be able to do it under the way the current law is designed?

Mr. **Van Lare**. If the proposed reporting and approval to performance standards are implemented, it is our understanding that we would have access to that kind of data.

Mr. **McKernan**. Thank you.

Mr. **Frank**. Let me ask a question on the controversy that may exist over the national performance standards. I take it from the inability of either of you to talk with any certainty about OMB's hesitancy that OMB has not discussed with either mayors or Governors this issue? Is that correct?

Mr. **Van Lare**. That is correct; I believe there has been a very brief conversation between Governor Du Pont and Budget Director Stockman, but that that conversation did not go into the details of the concern.

Mr. **Frank**. It disturbs me that the standards were promulgated on April 26. The deadline is coming up by which time OMB has to make a decision. There is a fairly impressive consensus that national performance standards are important. OMB, we all understand, is unhappy about that and perhaps wants to change it, yet they haven't discussed that with the participants. Contemplation is a virtue but I don't think it ought to be the exclusive process for making an important public decision. And the notion that you avoid excessive Federal dictation by Federal Government agencies making decisions without talking to anybody locally in the interest of localism is a litle bit paradoxical. I would hope that OMB, having chosen not to talk to you directly, will be aware of what conversations are ensuing here and be influenced by it. I certainly intend to communicate that to them.

I am just puzzled that it seems to me a particularly ideological and abstract notion of local control and flexibility that one would do this without talking to the local people. And I gather what you are saying is that it is not a question of whether it would be more or less paperwork so much as there would be the right kind? There is going to be this kind of data collected anyway out of a sense of responsibility. You are saying it makes more sense for you to collect it?

Mr. **Holland**. That is correct. I can cite for you a specific case that arose on Friday when I attended a meeting in Sacremento which the State of California staff held of anything on data systems. They decided they had to do something so we had the meeting in Sacramento. They came out with a proposal to require from staff of all local levels a quarterly report which would include something like almost 1,000 data elements, a fairly substantial report, about 400 percent more than we currently are reporting quarterly in the CETA program. And yet, the only OMB-approved Federal report we have to go on right now would be a quarterly report that includes only 17 data elements.

I don't think those 17 data elements are going to satisfy you in Congress in terms of assessing how well or how poorly the programs have done. We need to get somewhere in between.

Mr. **Frank**. If the Labor Department standards were approved by OMB, that would require you to do less than the tentative group proposal?

Mr. **Holland**. I think it would come out somewhere in between where CETA is right now. It would be a little bit different regarding issues covered. There would be national consistency and we would have confidence that this is the way it is going to be for a while. "Go out and get data systems, begin the program and collect the data that you are going to want in the future and have some confidence that it will be useful."

Mr. **Frank**. And when are you starting? October 1?

Mr. **Holland**. Yes.

Mr. **Frank**. That is another disturbing element. OMB has had these since April 26 and you are supposed to start on October 1. I don't understand why it has taken so long. I hope that they would move very quickly.

Let me ask both of you the question I asked before with regard to the numbers of people served. What is the application process? People are going to read about this in the paper and they are going to apply to get into the program? How is that going to work for the potential trainees? How is that supposed to happen?

Mr. **Van Lare**. My impression is that that will vary from service delivery area to service delivery area. It would depend in part on the local plan that has been developed, the kind of outreach activities that have been included to deal with welfare populations and others. I think, though, there is clearly a much larger pool of potential participants than, in fact, can be served initially.

Mr. **Frank**. We will probably have a situation where those administering the program will have to be turning people away in some cases. Many of these people who would like to get the training but won't be able tc be accommodated.

Mr. **Van Lare**. That is certainly a real possibility.

Mr. **Frank**. So it has been a case of the Federal Government having created and decided to fund a program at a level that is inadequate to take care of the need and we will all be able to say, "Gee, isn't it too bad that the mayors and the Governors didn't take care of you all."

Mr. **Van Lare**. I don't expect that to happen.

There is, though, another consideration—that is that is the question of balancing services to participants with the actual development of jobs for people to move into after training. I am not suggesting that there is not a need for more training money because I think there is, but I think we are looking for some balance of the commitment to the economic development aspect as well as to the training aspect.

Mr. **Frank**. That is an important point because training people is part of it, but economic policies that have jobs available is at least as important, probably more important particularly when we are talking to mayors and Governors where that becomes a regional issue as well. There will be parts of the country where all the training in the world isn't going to provide people jobs except to train each other if we don't do more to actually produce the jobs.

One problem we have there is the potential for conflicts among eligible groups. I had a hearing in Massachusetts earlier in which

Vietnam veterans expressed a great deal of concern about their access because the specific set-aside for Vietnam veterans is fairly small. As I understand this program, it is hardly adequate. We have the concern with displaced workers that Mr. McKernan mentioned, and young people as well. Is that likely to be a problem? Are we likely to be in the midst of some group conflict where a lot of legitimate groups are going to be forced to be fighting with each other?

Mr. HOLLAND. Yes; I don't know what the forum for those conflicts is going to be right now. We are not sure, for example, at the local level where the special JTPA veterans money or the older workers money is going to go, how it is going to be administered at the State level down to the local level. I think perhaps the State of California hasn't had an opportunity yet to make that decision. The group conflicts are nothing new. They always existed under CETA. The forum for resolving them had always been at the local level in the past and that is no longer going to be the case. You are going to have an interesting situation of people trying to seek out what their forum is to resolve those group conflicts.

Mr. FRANK. I note entitlements have become unpopular. Selectively, entitlements for wealthy farmers are not unpopular. Apparently that is a different kind of entitlement. But we see what happens when you have the alternative to an entitlement. It seems to me, if this program works well, and I am not sure how well it is going to work, the more grief we may all have. The better this program does its job of training people who have had problems getting employed and succeeds in placing them, the greater the demand is going to be for the placement.

Outreach is important at first, but if it begins to develop a success rate and word of mouth travels, then you will have more and more people looking to get in. I think one of the worst things we could do would be to keep it at a restricted level at that point and have not just individuals failing to get in, but promote ultimately group conflict with Vietnam veterans and racial minorities and others. I would hope one of the things we will be watching for is to be aware of that potential and be ready to increase this program if it works well.

It is at a level which may be appropriate for a program we are not sure about, but as it begins to work, if it does, then it is going to be essential to improve it or we will wind up exacerbating tensions.

Mr. OWENS. I am a little shocked at the fact that we have, over the past 10 or 20 years, launched several major programs of this nature and there always seems to be the same kinds of problems in startup. I would like to ask, do you think the State associations, the Conference of Mayors, and the municipal association are taking as much initiative as they could to develop their own system and to present it to OMB as a fait accompli? What prevents that? I am particularly concerned with the data collection system.

Mr. VAN LARE. We have tried in a number of instances to develop voluntary data reporting systems. They have been useful and had some success, but they have never been universal and they are really not a substitute in most instances for national reporting.

We have tried to communicate with as many States as possible about the importance of comparable data.

Mr. OWENS. Do you have a model system?

Mr. VAN LARE. We do not have a model system in the JTPA area.

Mr. OWENS. Is anybody developing a model system?

Mr. HOLLAND. I think probably you will find each State and each locality that has administered a CETA program, it has a model system. The point is it is a Federal program and we ought to be dealing with common Federal issues that are in that legislation and we need to have a starting point, a comparable data system that says an apple is an apple and an orange is an orange.

Mr. OWENS. Numerous committees and conferences are held with mayors and Governors et cetera, and they have never sat down and formed a committee and said, "Let's develop our own model system and present it to OMB."

Mr. HOLLAND. I don't think we can probably do better than the Labor Department did in April in terms of the system it proposed. It is a good system.

Mr. VAN LARE. I think that has been the investment that State people and local and private sector people have made is in working with the Department of Labor in the development of the system which they, in fact, presented to OMB and I think that that is a critical element.

Mr. OWENS. That is a model system?

Mr. VAN LARE. It is a model to the extent that it identifies the uniform elements of data that are needed. The actual management information system, which is going to have to be built in each service delivery area and at the State level, is going to reflect additional elements that are needed. Those are going to vary from State to State.

The things that we are really trying to focus on in terms of the DOL proposal are those things that really should be uniform everywhere and to get those put in place by the Federal Government so that when we go and actually build the individual systems—buy the equipment, design the forms and so on—we can accommodate what is needed nationally.

We are making information available to States on what happened in CETA systems and what States are doing to develop systems so that they can learn from each other. Because of the fact that the systems have to respond to the local needs, there really is no one system that you can put in place required of everyone.

Mr. OWENS. Does a set of elements exist now at the Department of Labor the States argue is desirable?

Mr. VAN LARE. Yes, sir.

Mr. OWENS. They could take the lead in developing such a model system if necessary?

Mr. VAN LARE. Yes, sir.

Mr. OWENS. Thank you, Mr. Chairman.

Mr. FRANK. Mr. Spratt?

Mr. SPRATT. At this stage, have you encountered any problem with the composition of your private industry councils? Are you finding resistance to the composition of these among the people whom the program is supposed to help?

Mr. **Holland**. That is going to basically occur at the local level. I can't give you an answer that would cover all the different localities of the United States. I can speak for my own area.

We have encountered no problems, per se. We have more people wanting to get onto the private industry council from both the private sector, the community and organized labor sector than we ever anticipated. Our problem is being able to make it workable and keep it relatively small in size and give it an adequate role. We have not progressed very far in California, primarily because we don't have the service delivery areas designated yet. As soon as that happens, we are ready to go ahead and ratify the councils that have been appointed and to move in that direction—but I think the response in terms of who is interested in getting on that council has been quite surprising, especially for the private sector.

Mr. **Spratt**. Among the target groups whom the program is designed to serve, hard-core unemployed and the unskilled, do you find objections based upon their perception that these committees are not being understanding or sensitive to their situation?

Mr. **Holland**. Yes, sir; specifically, in our area, in fact, we have had a proposal put together about 2 weeks ago by our CETA advisory council to ask the mayor to permit the board of supervisors—we have an 11-member board of supervisors—to appoint a member of the private industry council that represents the interests of community or labor. We would have to appoint 12 more private sector people to do that, and we have already contacted the chamber of commerce for additional nominees.

The problem is that we are going to end up with a local PIC that is so large that this room would not be satisfactory for housing it for a meeting.

Mr. **Spratt**. I just returned from 1 week in my district, and in my district rural unemployment is a problem, and there were objections expressed at local town meetings which I held among people who felt that the PIC committees were comprised largely of chamber of commerce types, industrial types who did not understand rural unemployment, the intractability, the difficulty of the problem and were not sensitive to it, and they did not feel represented. How widespread this problem is, I don't know.

I am telling you something anecdotal that I bring back, and I wonder if you were encountering it?

Mr. **Holland**. I heard it frequently. We also hear it at the State level and its legislature is considering an amendment to its implementation legislation for JTPA to add two seats to each PIC over and above the Federal requirements. One would be to represent the interests of welfare recipients and the other would be to represent the interests of child care consortia.

Mr. **Spratt**. I understand that part of the reason for bringing industry more significantly into the process, representing them on these PIC committees, was to relate employment training with actual local job availabilities.

Do you see this theory being borne out in practice?

Mr. **Holland**. I can only speak for San Francisco in that regard. At the present, yes, sir. In San Francisco for the past 1½ years, the PIC has had concurrent authority over all the programs, and we have been able to raise from the private sector resources that are equal to almost half of what the CETA moneys have been—and that is going to be an important commitment. I think we still have to deal with the perception that you alluded to earlier that the private sector will not represent all the interests of the community. And I am not sure that that perception will ever be a satisfactory result for everybody in the community. But we have been very pleased.

Mr. **Spratt**. What sort of resources are you talking about? How do you raise these resources? Are they administrative expenses?

Mr. **Holland**. Basically, program resources. Very few for administrative expense; basically program. We have had moneys come in to establish, for example, a youth conservation corps project in the city operated through the private industry council, as such. Our private industry council in San Francisco is independently incorporated, so it can receive donations, and, in fact, for a corporation wanting to donate, it is a better deal—to give it to the corporation—because it is a 501(c)(3) entity than to give it to the city, because they could not get the tax writeoff. So all of it has gone into the program.

In our summer program the latest count we had is 60 slots which are summer interns where the donating corporation has said, "I would like to hire youths during the summer, but I just can't afford to do it directly. I will give you—that is, the PIC—the money instead and you create intern slots and set up other places to put these people to work." It has been very successful.

Mr. **Spratt**. And you have made the PIC council a vehicle for doing this since the Government could not do it itself?

Mr. **Holland**. That is right.

Mr. **Spratt**. Thank you very much.

Mr. **Frank**. Thank you.

Thank you, gentlemen.

Next we will hear from Pierce Quinlan, executive vice president for operations of the National Alliance of Business; and Vicki Reitano, executive director, Memphis and Shelby County Private Industry Council, Inc.

STATEMENT OF PIERCE QUINLAN, EXECUTIVE VICE PRESIDENT, NATIONAL ALLIANCE OF BUSINESS, ACCOMPANIED BY MADELEINE HEMMINGS, VICE PRESIDENT FOR POLICY

Mr. **Quinlan**. Mr. Chairman, I appreciate the invitation to appear before the committee and express our views of the National Alliance of Business on performance standards and data collection activities.

I have a statement here which is provided to you, and since many of us are talking about the same hymnbook, I won't go through that whole statement but rather hit the key points.

Mr. **Frank**. Thank you. I have been remiss in saying that if there is no objection from members of the committee, we will submit all the statements which have been presented to us for the record in their entirety.

Mr. **Quinlan**. Thank you, Mr. Chairman.

My name is Pierce Quinlan. I am executive vice president of the National Alliance of Business. With me today is Madeleine Hemmings, our vice president for policy.

The National Alliance of Business is an independent, business-led, nonprofit corporation whose mission is to increase private sector training and job opportunities for disadvantaged and long-term unemployed persons through strong public/private partnerships of business, government, labor, education, and community-based organizations. The alliance has had nearly 15 years of experience helping unemployed youth and adults to obtain productive jobs in business and industry.

Every administration since NAB's founding in 1968 has turned to us to continue our lead in developing and maintaining business community commitment to train and employ the disadvantaged. NAB worked hard for passage of JTPA along with other major national business organizations, and this relationship continues in support of the implementation.

This is taken in the context of the fact that JTPA represents the most significant change in employment and training since 1973 and 1974 when the CETA program was originally started. So certainly in some instances delays will occur, because of the fundamental nature of the change. I think the wisdom of Congress in building in the additional 9-month transition period starting the October 1 will be borne out.

I am not concerned particularly about transitional problems, because I think that the programs will be carried over in many instances the same way that they have been operated under the previous program. But the 9-month period does allow an additional period for more thorough planning.

The support of the business community for the Job Training Partnership Act was dependent on the program being a performance-driven system. That is the clear understanding on the part of all participants in terms of what the goals were and what standards would be used to measure the results of the program. In order to do that, you have to have a uniform reporting system with uniform definitions.

We believe that the Labor Department has done a good job in working with all facets of the community, be that the Governors or the business community or local government, in the development of the performance standards. It has been an open process. We have worked with the Governors Association and the National Commission for Employment Policy in communicating our concerns and interests to OMB about the establishment of performance standards, and a uniform reporting system.

We believe that one of the critical elements is to capture information on the characteristics of the people being served, because there is a need to avoid any kind of implication of creaming. Creaming would undermine the purpose of the legislation which is to serve the most disadvantaged individuals. We are concerned that unless the April 26 Labor Department guidance on uniform reporting is provided, neither the Congress nor the business community nor any of the other participants in the employment and training system will have sufficient information with which to evaluate the system.

We would suggest that the arrangements laid out in the Labor Department performance standards will actually become the discipline for the system. Having the performance standards will avoid the necessity for a myriad of individual field memoranda and other kinds of guidance directed toward correcting perceived or real problems. Without the requirement for a consistent methodology there won't be any such discipline in the system. That is why we support the Labor Department standards and have worked with the other organizations to present our position to the Office of Management and Budget. We believe that the DOL reporting requirements are the absolute minimum that should be requested.

If we were asked whether there should be any additional requirements applied, the only thing that we would say is that it might make some sense to collect information on a person's progress after completion of training and getting a job for a period of 26 weeks rather than the 13 weeks that are proposed. This would simply give more accurate information in terms of the program's success. But, I would hasten to add, this is not a central problem or criticism of the standards—just a suggestion.

Also, I would join with the other people who have spoken to the committee to strongly suggest that the Labor Department's proposal be adopted as quickly as possible for the reasons that were mentioned. There is a significant lead time in establishing reporting systems and the absence of national standards will produce 50 or more individual systems which can obviously produce a chaotic situation.

On balance, what we have seen so far is that the various partners in the job training partnership system have stepped up to the challenges. We feel very good about what the business community has done so far through the chambers and other business organizations in terms of the willingness to join private industry councils.

As many of you may know, the business community did not have the highest regard for the CETA program. The assurances we have been giving—and the National Association of Manufacturers, the chamber of commerce and other members of business organizations—to the business community to get involved and be involved in a performance-based system has been, I think, an important element in their involvement to date.

We don't recommend legislative changes at this time. I think one of the important elements necessary to get the business community involved in JTPA, is the assurance of continuity rather than constant change, as has sometimes characterized previous employment and training legislation. For this reason, we do not recommend any changes to the JTPA legislation.

In summary, Mr. Chairman, our position is similar to that of the national commission and the other participants here. We need to have a standardized reporting system to support a performance-based job training program, and that reporting system needs to be issued as soon as possible—like right away.

Thank you, Mr. Chairman.

Mr. **Frank**. Thank you.

[The prepared statement of Mr. Quinlan follows:]

TESTIMONY
Of
The National Alliance Of Business
Before The
Subcommittee On Manpower And Housing
Of The
House Committee On Government Operations
On
Performance Standards And Data Collection Systems
Under The
Job Training Partnership Act
July 12, 1983

Mr. Chairman, thank you for your invitation to appear before this Committee to express the views of the National Alliance of Business on performance standards and data collection activities under the Job Training Partnership Act (JTPA).

My name is Pierce Quinlan. I am Executive Vice President of the National Alliance of Business. With me today is Madeleine Hemmings, our Vice President for Policy.

The National Alliance of Business is an independent, business-led, non-profit corporation whose mission is to increase private sector training and job opportunities for disadvantaged and long-term unemployed persons through strong public/private partnerships of business, government, labor, education, and community-based organizations. The Alliance has had nearly 15 years of experience helping unemployed youth and adults to obtain productive jobs in business and industry. Every administration since NAB's founding in 1968 has turned to us to continue our lead in developing and maintaining business community commitment to train and employ the disadvantaged. NAB worked hard for passage of JTPA along with other major national business organizations and this relationship continues in support of the implementation.

In general, the transition from the Comprehensive Employment and Training Act to the Job Training Partnership Act is going well considering the very short timetable everyone is working against to make major changes in both the administrative systems and the program. All of the State Job Training Coordinating Councils have been appointed. Most of the service delivery areas have been designated. Many of the private industry councils are established and certified, and many areas have begun work on their job training plans with the goal of having the new system in place and programs operating by October 1.

Some areas will need more time to fully complete the transition process. There have been unforeseen delays and appeals on service delivery area designation which have required time to work out. But on the whole, we are pleased with the progress. We expect changes to the system will continue over the first nine months of the coming fiscal year as thousands of new

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members of private industry councils become more familiar with the new system and its potential for meeting labor market needs.

We have and continue to work with a number of business organizations around the country, to help them understand what the Act provides and how they can best work with the system and in support of both the State Job Training Coordinating Council and local private industry councils. We have found that business support of JTPA relies substantially on the expectation of an easily understood and uniform performance-based system as a bottom line for business to judge the program's success.

The Alliance shares your interest in establishing a sound and workable system for measuring program performance for the funds used under the new Job Training Partnership Act (JTPA). Critical to the success of this employment and training program is the ability of states and local service delivery areas to measure their program results against acceptable national goals. It is our intention to work with the PICs to help them meet the bottom line performance standards through materials and training programs.

Last year, during the development of JTPA legislation, the National Alliance of Business and other national business organizations encouraged Congress to include the principle of "performance, not process" in the design of program management. Experience with CETA taught us that a prescriptive federal role, implemented with frequent field memoranda and administrative issuances, forced local program managers to focus their efforts on paperwork rather than on effective training and job placement. Business support for JTPA was conditioned on the inclusion of performance standards to measure the "return on investment" produced by local training programs. Establishing such standards is, from the business perspective, the most important federal responsibility in the decentralized JTPA system. Business is accustomed to measurement and appraisal systems and will actively support well thought out systems which result in consistent rewards and sanctions.

The principle of emphasizing performance over process in management simply cannot be realized without a credible, enforceable system of performance standards. The JTPA requirements for performance standards provide a vehicle which allows the federal government to maintain appropriate accountability for federal funds without heavy-handed regulation.

Performance standards will eventually become the discipline in this system, as well as a tool for monitoring progress in meeting our critical training needs. Without a requirement for consistent methodology in all states and service delivery area, there will be no discipline in the system. Without the footing of uniform reporting categories, inconsistent definitions and reporting systems could be implemented among the states, permitting no accurate national measure of performance.

The Act acknowledges the importance of designing sound performance standards that build in accountability and, as a result, allows more time for their development than other aspects of the transition. As you know, the Secretary of Labor is not required to establish standards for the first program year until January 31, 1984.

The Department of Labor should be commended for its approach to seeking advice on the standards from experienced organizations and individuals in this field. Early in the implementation process, the Department established a Performance Standards Advisory Committee which was broadly representative of the expertise in the employment and training system. The National Alliance of Business has served on the committee since its inception. We believe that the draft standards proposed by the Department reflect well the work of that committee.

In addition to our role on the advisory committee, we have worked closely with the National Commission for Employment Policy and the National Governors' Association in supporting the Department's proposals for the necessary reporting requirements and regression-based methodology which makes application of the standards fair, equitable, and comparable across states and localities.

The Department has proposed seven broad measures of performance. For adults, the measurements reflect rates for: entered employment, cost per entered employment, average wage at placement, and welfare recipient entered employment. For youth, the measured rates are: entered employment, positive termination, and cost per positive termination. There is no argument with these measures. They are required by the law, and are generally agreed to be the basic measusres of this program's success. Adequate experience exists in the system for collecting the information.

The real issue at hand is whether to require a nationally uniform reporting system which includes information about characteristics of clients served. The Alliance believes such information is necesary to make credible evaluations, and to provide the rewards or sanctions based on program outcomes which the law requires.

However, if neither the federal government nor the states can adjust performance standards according to characteristics of the clients they must serve, we would create a system which encourages a practice called "creaming" -- avoiding the more difficult clients in order to improve reported performance. In fact, without the ability to adjust standards, the system would punish those who did not "cream" participants to improve their cost per placement rating. This would undermine the very purpose of the Act. What the Department has proposed is a "regression-based" methodology which would neutralize that bias for creaming, permitting localities to serve difficult clients without being penalized by the standards.

The effectiveness of the proposed standards hinges on this regression-based methodology which uses uniform data on client characteristics and allows localities to adjust the standards to account for their own special economic and participant mix. It is a complicated methodology, but it is the best that anyone has developed so far, and experts agree that it is workable.

The data reported would be uniform throughout the system and the regression analysis allows it to reflect, equitably, the performance of those areas having different degrees of hard-to-train participants and varying economic circumstances. The data required is detailed enough to enforce the standards, but not so detailed that it places and excessive burden on state and local administrators.

We believe the proposed reporting requirements are the absolute minimum that should be requested. If we were to recommend any changes to the proposal, we would prefer that post-program data on a client's progress be collected at 26 weeks rather than at the 13 proposed. Measuring long-term progress at 26 weeks would provide better information on the impact of programs in achieving quality placements for participants, earnings gains over a more meaningful period of time, and reductions in welfare dependence. Collection of this data would help minimize incentives to place participants in short-term, low-paying jobs.

Mr. Chairman, the strongest argument for adequate uniform reporting requirements and consistent methodology in applying standards is that without them Congress will have no reliable data on who is being served by JTPA, or whether it is successful. When it comes time for Congress to assess JTPA performance and make the crucial decisions regarding its funding and future, reliable data on the participants served and program results will be esential. This is a time of scarce federal resosurces and serious concern about spending priorities. The documentation of costs and benefits of the Job Training Partnership Act must be valid. Without an adequate information system, Congress will be forced to rely on samplings, studies, or impressions to make its judgments.

The development of effective standards is a difficult task in any program, so we were encouraged when the Department's proposal was developed in a timely way. We are pleased that Congress also recognized that the transition from CETA to JTPA would need time, especially for the new measures of program effectiveness to be developed, and did not require the application of standards until next July 1.

We believe that the Department's proposal ought to be adopted and issued as quickly as possible. If that happens, system managers will be able to design their information systems to provide the necessary data from the beginning. Early issuance of the DOL standards could mean real cost savings as management information systems will need to be set up only once.

To conclude, let me stress again the interest we all have in building strong public/private partnerships throughout the system and to work together on these problems. The opportunity exists to make great advances in the way we try to deal with the critical economic issue of job training by utilizing competitive standards of performance.

Stability and continuity in the legislation and regulations are paramount to getting and keeping business involved in the system itself and as employers of the trainees. For this reason, we do not recommend making any changes to the legislation.

Business has vigorously stepped up to the tasks under JTPA. The Chambers have been active in the nominations process and in attracting the participation of business leaders across the country. Apparently, the spirit and principles of the law are being incorporated into the system. PICs have been formed and over 11,000 business volunteers will be involved in private industry councils.

The Alliance will continue its committment to work with State Job Training Coordinating Councils, private industry councils, with business organizations and employers to help ensure that programs serve those in need. We will continue to work with all the partners under JTPA to build an operate an employment and training system which is effective for both trainees and employers and for those responsible for its management.

Mr. FRANK. Ms. Reitano?

STATEMENT OF VICKI REITANO, EXECUTIVE DIRECTOR, MEMPHIS AND SHELBY COUNTY PRIVATE INDUSTRY COUNCIL, INC., MEMPHIS, TENN., ACCOMPANIED BY ROBERT KNIGHT, EXECUTIVE DIRECTOR, NATIONAL ASSOCIATION OF PRIVATE INDUSTRY COUNCILS

Ms. REITANO. Thank you, Mr. Chairman.

Mr. Chairman, members of the Subcommittee on Manpower and Housing: I am Vicki Reitano, executive director, Memphis and Shelby County Private Industry Council, Inc., Memphis, Tenn. I am appearing before you today on behalf of the National Association of Private Industry Councils, NAPIC, on whose board of directors I have served for the past 3 years. Accompanying me is Robert Knight, executive director of our association.

NAPIC is a nonprofit association of some 80 local private industry councils, PIC's, across the country, and is the only national membership organization of PIC's. I wish to thank the subcommittee for providing NAPIC the opportunity to testify on the implementation of the Job Training Partnership Act. I will briefly go through the summary of the testimony for you.

In our view, the Department of Labor has done a very good job with respect to the implementation of JTPA. While we have not always agreed with their regulatory and administrative issuances, we do find them timely, consistent, available for review and comment, and generally available to the system. In addition, the Department has been responsive to the technical assistance needs of the key actors at both the State and local level.

During today's testimony, we have been asked to focus on comments of performance standards, unified data collection, and management information systems. We find these topics to constitute an appropriate starting point for JTPA oversight hearings.

The business community and PIC strongly supported JTPA's establishment of the performance-driven job training system. Now it is critical that these standards and the data on which they are based be implemented in a fashion that recognizes and encourages appropriate human resource investments within the framework of a decentralized system.

While we do not claim technical expertise concerning the Department of Labor's April 26 issuance, we are convinced that the methodology used in developing those standards is sound. The use of a regression model is a sophisticated, fair, and neutral method to arrive at the standards.

In short, we wish to express strong support for the Department's proposal including the reporting requirements contained in that issuance.

At the same time, we should note that NAPIC has filed comments with the Labor Department concerning the proposal. The concerns expressed at that time were programmatic in nature rather than policy oriented. For example, our major concern was that PIC approved competencies for youth programs, while encouraged, were not included in the positive termination category. However, we believe that this shortcoming may be corrected if a suitable data base is developed.

Nonetheless, in our view, there are several key reasons to support and to require a national reporting system for JTPA. While a reduction in the reporting requirements that grew over the years around CETA is essential, it remains important to maintain a systematic approach to documenting our experiences under JTPA.

A record of client characteristics, program activities, and client outcomes provides basic management information that is essential to the administration, Congress, States, and local areas as they attempt to monitor and evaluate the public investment in job training. Without a national reporting system, Congress and the administration will lack reliable data on who is being served and in what manner under JTPA. Efforts to assess at the national level performance under JTPA as job training competes with other programs for limited Federal dollars will become difficult, if not impossible.

In the absence of a national reporting system, we may end up with over 50 different employment and training languages. The ability to share information on what works for whom and to evaluate new ideas across State lines will be seriously undermined. In our judgment, the resultant information vacuum and isolation of PIC's and program administrators would be detrimental to the improvement of the job training system.

In short, national performance standards based on a national reporting system would constitute the strong engine that was intended to drive the job training system under JTPA. Such a system will encourage better performance throughout the country. Therefore, we support the early approval and implementation of the proposed Secretary's performance standards and reporting requirements so that States and localities will have sufficient time to bring their systems into conformity with the proposal.

Before concluding, we wanted to make some general observations on the implementation of JTPA. The process of nominating, appointing, and certifying the PIC's has taken longer than was originally anticipated. As a result, most PIC's face a summer agenda that includes developing internal operating procedures, establishing its roles, and negotiating an agreement with the local elected officials concerning the administration of the local job training program, and approving a plan for the 9-month transition year beginning October 1, 1983.

Given the importance and complexity of working out institutional roles and responsibilities for the PIC, it is now clear that the transition period in many, possibly most, communities will stretch on for another 6 months to 1 year. Given the importance of this period in establishing a firm local partnership between the PIC and local elected officials, we encourage the Congress to assist in making the next year one of consistency and stability for JTPA.

While problems have surfaced and will continue to do so, we believe that every one of them can be solved by administrative means or through technical assistance of some sort. It should not be necessary to amend JTPA until we have had a period of actual experience in which to test its strengths and weaknesses.

In summary, NAPIC supports a national reporting system and a system of performance standards that promotes improved performance nationwide without becoming burdensome in its administrative detail. The Department of Labor has proposed such a system and it ought to be approved without delay. We are generally encouraged by the progress of the transition and believe that those problems that do arise can best be resolved through administrative rather than legislative interventions.

[The prepared statement of Ms. Reitano follows:]

STATEMENT OF VICKI REITANO
on behalf of
THE NATIONAL ASSOCIATION OF PRIVATE INDUSTRY COUNCILS
before the
UNITED STATES HOUSE OF REPRESENTATIVES
COMMITTEE ON GOVERNMENT OPERATIONS
SUBCOMMITTEE ON MANPOWER AND HOUSING
July 12, 1983

Mr. Chairman, members of the Subcommittee on Manpower and Housing, I am Vicki Reitano, Executive Director, Memphis and Shelby County Private Industry Council, Inc., Memphis, Tennessee. I am apearing before you today on behalf of the National Association of Private Industry Councils (NAPIC), on whose Board of Directors I have served for the past three years. Accompanying me is Robert Knight, Executive Director of our association. NAPIC is a nonprofit association of some 80 local private industry councils (PICs) across the country and is the only national membership organization of PICs. I wish to thank the Subcommittee for providing NAPIC the opportunity to testify on the implementation of the Job Training Partnership Act.

As you know, the Job Training Partnership Act of 1982 (JTPA) represented a delicate set of compromises on issues central to the administration, funding and operation of job training programs for the nation's low income youth, chronically unemployed adults, and displaced workers. While we deem it accurate to say that none of the groups or organizations testifying during these hearings was totally satisfied with the final legislation, we are committed to working together to foster active business-led PICs and the effective partnerships of the private and public sectors at the state and local levels which the framers of this important legislation envisioned. Toward these ends, we look forward to cooperating with the Congress and the Administration in tracking the implementation of JTPA. It is our belief that the promise of JTPA can be translated into effective job training programs that serve both the unemployed and the private employers of our communities.

In this regard, we note that local partnerships are dependent on the willingness of elected officials, business leaders, educators, and others to share decision-making authority and the responsibility for the results of said decisions. This willingness cannot be mandated at the federal level. However, national leadership can establish a climate of cooperation. Furthermore, administrative decisions at the national level that are clearly articulated, consistent and adequately disseminated can assist the local partnership. Finally, technical assistance appropriate to varied local circumstances can assist the transition to JTPA.

In our view, the Department of Labor has done a good job with respect to the above points. While we have not always agreed with their regulatory and administrative issuances, we do find them timely, consistent, available for review and comment, and generally available to the system. In addition, the Department has been responsive to the technical assistance needs of the key actors under JTPA at the state and local level. NAPIC will serve as a subcontractor providing information and assistance to PICs under one of the national contracts. Also of significance is the fact that the Department requires the various national contractors to meet periodically to share ideas, eliminate duplication, and ensure that the transition needs of the system are being addressed.

During today's testimony, we have been asked to focus our comments on performance standards, unified data collection, and Management Information Systems (MIS). We find these topics to constitute an appropriate starting point for JTPA oversight hearings. The business community and PICs strongly supported JTPA's establishment of a performance driven job training system. Now it is critical that these standards and the data on which they are based be implemented in a fashion that recognizes and encourages appropriate human resource investments within the framework of a decentralized system.

While we do not claim technical expertise concerning the Department of Labor's April 26, 1983 issuance (Proposed Secretary's Performance Standards and Reporting Requirements), we are convinced that the methodology used in developing those standards is sound. The use of a regression model is a sophisticated, fair and neutral method to arrive at the standards. In short, we wish to express strong support for the Department's proposal, including the reporting requirements contained in that issuance.

At the same time, we should note that NAPIC has filed comments with the Labor Department concerning the proposal. The concerns expressed at that time were programmatic in nature rather than policy oriented. For example, our major concern was that PIC approved competencies for youth programs, while encouraged, were not included in the positive termination category. However, we believe that this shortcoming may be corrected if a suitable data base is developed.

Nonetheless, in our view, there are several key reasons to support and to require a national reporting system for JTPA. While a reduction in the reporting requirements that grew over the years around CETA is essential, it remains important to maintain a systematic approach to documenting our experiences under JTPA.

A record of client characteristics, program activities, and client outcomes provides basic management information that is essential to the Administration, Congress, States and local areas as they attempt to monitor and evaluate the public investment in job training. Without a national reporting system, Congress and the Administration will lack reliable data on who is being served and in what manner under JTPA. Efforts to assess at the national level performance under JTPA as job training competes with other programs for limited federal dollars will become difficult, if not impossible.

In the absence of a national reporting system, we may end up with over 50 different employment and training "languages". The ability to share information on what works for whom and to evaluate new ideas across state lines will be seriously undermined. In our judgment, the resultant information vacuum and isolation of PICs and program administrators would be detrimental to the improvement of the job training system.

In short, national performance standards based on a national reporting system would constitute the strong engine that was intended to drive the job training system under JTPA. Such a system will encourage better performance throughout the country. Therefore, we support the early approval and implementation of the Proposed Secretary's Performance Standards and Reporting Requirements so that states and localities will have sufficient time to bring their systems into conformity with the proposal.

Before concluding, we wanted to make some general observations on the implementation of JTPA. The process of nominating, appointing, and certifying the PICs has taken longer than was originally anticipated. As a result, most PICs face a summer agenda that includes developing internal operating procedures, establishing its roles and negotiating an agreement with the local elected officials concerning the administration of the local job training program, and approving a plan for the nine month transition "year" beginning October 1, 1983. Given the importance and complexity of working out institutional roles and responsibilities for the PIC, it is now clear that the transition period in many, possibly most, communities will stretch on for another six months to a year. Given the importance of this period in establishing a firm local partnership between the PIC and local elected official(s), we encourage the Congress to assist in making the next year one of consistency and stability for JTPA. While problems have surfaced and will continue to do so, we believe that every one of them can be solved by administrative means or through technical assistance of some sort. It should not be necessary to amend JTPA until we have had a period of actual experience in which to test its strengths and weaknesses.

In summary, NAPIC supports a national reporting system and a system of performance standards that promotes improved performance nation-wide without becoming burdensome in its administrative detail. The Department of Labor has proposed such a system and it ought to be approved without delay. We are generally encouraged by the progress of the transition and believe that those problems that do arise can best be resolved through administrative rather than legislative interventions.

This concludes our prepared statement. We appreciate the opportunity to appear before the Subcommittee. We would be happy to answer any questions you may have.

Mr. **Frank**. Thank you.

Mr. McKernan?

Mr. **McKernan**. Let me ask both of you to comment on the rumor that we have heard on Labor and OMB and ask whether either of you have been in contact with OMB since you have both called for approval of those standards?

Mr. **Quinlan**. Mr. McKernan, we submitted some time back a letter from our president to Budget Director Stockman indicating what our concerns were and the need for rapid approval by OMB of the plan that we have been talking about this morning.

Ms. **Reitano**. I personally have not been involved with the Office of Management and Budget, therefore and have obviously heard no rumors. Bob might want to address that for the association.

Mr. **Knight**. NAPIC has also submitted a letter to Mr. Stockman urging the approval of the proposed standard.

Mr. **McKernan**. Have either of your organizations heard back from OMB?

Mr. **Quinlan**. No, sir.

Mr. **Knight**. No.

Mr. **McKernan**. When were these communications?

Mr. **Quinlan**. Our letter was June 1.

Mr. **McKernan**. Do you know about when yours was?

Mr. **Knight**. Ours was about 1½ weeks ago. I will have to check.

Mr. **McKernan**. Ms. Reitano, you are representing some of the private industry councils. You are saying this is going to be a summer when there will have to be a lot done in a hurry.

Is it true throughout the country that the PIC's have sort of been slow to get started?

Ms. **Reitano**. Our organization took a poll of its membership, and I am not sure of the exact figures but the majority of the replies indicate that there has definitely been a slow progression toward our goal of a startup of October 1. However, I will say that I think almost uniformly everyone said that they would meet their August 31 deadline for the plan.

My only comment would be, with the timeframe, how well can those plans be developed given the shortness of time.

Mr. **McKernan**. Many of these people who are on the PIC's have participated in the old CETA program and are fairly familiar with the kind of programs that we are talking about.

Ms. **Reitano**. Well, most of our membership, the majority of them, are a split between some involvement of the old PIC and some with the new. There are very few instances that we have observed where there are wholesale changes on the boards. So I would say that there would be at least minimal knowledge of past employment training programs.

Mr. **McKernan**. Have there been any comments by people on the PIC about status reports, specifically about filling those out and how adequate those are?

Ms. **Reitano**. I cannot speak for NAPIC. The only thing I can speak for is my involvement with business leaders in my area, and that is naturally one of the questions that they always ask when they become initially involved in these sorts of programs, but usually that is resolved very quickly.

Mr. **Quinlan**. The key issue has to do with getting to the bottom line, and the bottom line is what are the programs producing. Are they producing jobs for the best possible return on your money? And in order to make that determination between the individual jurisdictions, you have to have some consistent methodology, that is understood. That really is one of the premises for business support for JTPA.

Mr. **McKernan**. If, in fact, OMB's problem with the standards is that they will create excessive paperwork, has your organization or has the PIC group looked at whether or not the way the standards are going to be implemented will require excessive paperwork; and even though we are going through a national standards, whether the data collection system could be done in a less burdensome way?

Mr. **Quinlan**. We don't believe that the minimum data requirements—and that is really what they are—will produce unnecessary paperwork. I don't know whether the issue with OMB is a paperwork issue or an ideological issue about cutting back on various kinds of Federal requirements. I suspect that paperwork reduction may come up in the course of the discussion, but I suspect that it is more of an ideological issue.

Mr. **McKernan**. Let me follow up on that. I thought that for the most part the whole reason for JTPA was to give more local control with some national standards to make sure that people are meeting those goals and, therefore, would require some kind of a performance standard in order to make that judgment.

Mr. **Quinlan**. That is why we feel that the arrangements that have been worked out collaboratively between ourselves and the Labor Department and the other people involved hit the mark right about down the middle, and that is why those should be issued.

Mr. **Frank**. You raised a question in my mind about the process on the part of the Federal Government, Mr. Quinlan. Apparently, we have had very good set of working relationships between the Labor Department, and the various participants. You have all, I guess, had some interchange which has led to these regulations.

It just strikes me that for the Federal Government to have another agency which was under no obligation to participate in that process, come in and have a final veto is not a very logical way to proceed.

Mr. **Quinlan**. Mr. Chairman, I was in charge of the CETA program for the Labor Department in 1973 and 1974 during the initial startup of that program, so I am a living testimony of some of the issues that come up on this particular matter. The issues and problems that the Labor Department is facing now were identical to the problems that occurred in 1973 and 1974, simply because the OMB has had the requirement to approve all the reporting requirements that individual agencies issue. And for some logical reasons, so you don't have a dozen agencies going in a dozen different directions. So it is not a new problem. It is just one that needs to be solved quickly.

Mr. **Frank**. I agree. and I think it is one that we ought to be looking at.

As I listen to this, I am struck by the lack of communication between OMB and everybody else compared to the very good communication between the Department of Labor and everybody else. I gather they get your letters. We have no sign that they did not arrive. On the other hand, except inference, we have no sign that they did. It seems to me that this is something for the full Government Operations Committee to address. We might have to mandate some communication on the part of OMB.

I agree we need to have final uniform decisionmaking in the Government, but not one that is virtually incommunicado during the process.

Let me ask one of the questions that has come up several times. In this bill, Congress and the President decided to give businesses a majority on the private industry council. You alluded to the importance of trying to persuade businesses to participate because, without this, we don't have much of a program.

Are we going to be able adequately to represent the variety of other groups who I think we would also agree ought to be represented, people concerned with Vietnam veterans, people representing black and Hispanic populations? Currently, there are a large number of people who we seek to train, and there are some issues that come up there.

Does the structure that we now have allow for that, and are we providing for adequate representation for the major viewpoints that ought to be provided?

Mr. **Quinlan**. In my judgment, we do. The issue through the entire 20-odd years of history of employment and training programs in this country has been difficulty in getting the people who have the jobs to participate in the employment and training system. We felt that the 51-percent business membership on the part of the private industry councils would give a sense of ownership of the business community for employment and training programs. But the other 49 percent provides very substantial opportunity for other groups to be heard.

There will always be elements of contention, whether one group is heard sufficiently or not. But I believe that the 49 percent should provide ample voice for other people who are the service group or who happen to be members of various other groups, such as education, organized labor, and the like.

Again, that is the design. We don't have the operational experience yet, but it is our assessment that programs that bring jobs to the table are the ones that work most effectively. And this is the approach that seemed to be the appropriate one.

Mr. **Frank**. I understand that; obviously, that was a decision that was made.

I know you are doing it and I know the National Alliance for Business has been doing it—but maybe we could help reinforce your message that the 51 percent requirement is a little unusual, I think. The very fact that you characterized it, I realize not in the formal way but a general way, as ownership of a Federal Government training program by the business community is significant. I hope people in the business community understand that we were looking for something with that kind of deal. And I think there is going to be an expectation on the part of Congress that substantial elements of the business community, but certainly not everybody, would be forthcoming.

I think the Federal Government, having taken the step of a 51 percent control in the business community, I am hoping that that will be met with the kind of forthcoming response that it seems to me we were trying to get.

Mr. **Quinlan**. Results thus far look good in terms of willingness on the part of the business community to step up. The people who are getting involved also understand that they have a broad responsibility.

Mr. **Frank**. Let me ask a question in terms of the need. If this program were to work well—and I realize that we are experimenting with it—could we develop, as we all hope we will, effective methods of training, identifying jobs, what approximate percentage of the need. Do you think we are meeting those needs at the current levels? Is there room for expansion in the programs?

Ms. **Reitano**. Well, just the unemployment figures for summer youth in our area are 15,000, just in the Memphis area; and the CETA program itself only touched about 3,000 or 4,000 of those people, just in that particular category alone. We have a lot of plant closures, Firestone and International Harvester, in our area. For retraining, it would be applicable there, and all these people who are in the middle range, adults that need skills, I definitely think there will be room for expansion.

Mr. **Quinlan**. Mr. Chairman, I think the comments that Patricia Hogue mentioned, I think, are apropos. It is simply not possible to deal with the total universe in any given year.

The second point is probably the one that I would want to make most strongly. That is, based on past experience, the programs really do have to walk before they run. And if you try to put more responsibility on a program in the start-up phase, serious problems develop. If I had to put my finger on the one most serious problem that developed during my involvement in the CETA program, that was it. CETA was called on to do too many things too quickly.

Mr. **Frank**. I agree; that is why I stated it in my question.

I understand the need for beginning at a slower pace. I think also if we are going to do this, we ought to be thinking ahead. If we do, and it works well, then I think we ought to be thinking about whether or not it ought to be expanded. It would seem if we do get a program that works well and we are training people, that would seem to me a pretty good investment of Federal dollars. If there is a considerable unmet need out there and a program that works well in helping people to get the work——

Mr. **Quinlan**. I think the answer flows from what you said. If it works successfully, that is where your investment should go.

Ms. **Reitano**. I might add, one thing is that the beauty of the selling point to the business community has been that this is a training program, and if the economy does not turn around and there are not enough jobs to train people for, then you fall back into what Mr. Quinlan was talking about. And you definitely have to watch out for that, because the business community is going to back off if all they are doing is running people through programs and there is nothing out there.

So when that time comes for expansion, I think that would have to be addressed very strongly.

Mr. Frank. Presumably, the business community would then be supportive of a broader jobs program, and I look forward to that day when it comes.

Mr. Spratt. Ms. Reitano, you said that the process of nominating PIC's is taking more time than anyone anticipated. What, in fact, has been this process based on your experience, not only with your own organization, but based on your knowledge of other PIC councils? How has it worked? How have these PIC councils been composed? How have members for the council come forth or been selected? Who has taken the initiative in forming the council? In practice, how has this whole thing unfolded?

Ms. Reitano. It would be difficult for me to speak for our entire organization. I don't even know if we have that data available, and Mr. Knight might want to address that.

In our area of the country, in our State, the only thing that I can say, with my knowledge of the system, is that the business community has come forth with most of the names constituting the 51 percent. The others have come from both the State and local units of government.

Other requirements that he was referring to in the earlier question, those have been initiated by the local and State government individuals in our area.

Mr. Spratt. In the State of Tennessee, who was the catalyst for bringing these groups together? Was it the Governor's office?

Ms. Reitano. Yes, sir.

Mr. Spratt. Has this been true across the country?

Ms. Reitano. I cannot speak for across the country.

Mr. Quinlan. Yes, sir. I would say that it is true throughout the country, that the Governors' offices through the State job training coordinating councils, which was one of the earliest elements formed, have been very active in working with the local communities.

The PIC certification process, I would add, though, is not yet complete. I heard the comment from California, which had a late start, that the PIC's are not certified in that State, although I believe they are getting very close. The longer it takes in the certification process, the more compressed the planning is between now and October 1.

One of the immediate issues that the private industry councils are facing during the summer, is to be able to put together an effective plan between now and August 31, for activation on October 1.

Mr. Spratt. Who issues the certification?

Mr. Quinlan. That is done by the Governor and with the collaboration of the State job training coordinating council.

Mr. Spratt. Why has the process taken so long?

Mr. Quinlan. We have changed the basic relationships that existed between various elements of the private sector, and between the elements of the public sector, be it at the local level, the State level, or at the Federal level. It is perhaps, as I mentioned earlier, the most fundamental change certainly in 10 years, if not the most fundamental change in employment and training in the history of the country.

It is a major experiment. Inevitably, transition would take a long period of time. We had 19 or 20 new Governors in office this year. That is a factor, as well. And I think the wisdom of Congress of adding on another 9-month period from the 1st of October through the 30th of June, so that you work out any of the additional problems and really get into some sleeves-up planning, is borne out by experience to date.

I think transition takes a long time. It took a heck of a long time during the CETA period, and the timing was not sufficient then. So I think the mechanism is better this time and I think we learned from the last time.

Mr. SPRATT. The jurisdictional areas of the various PIC organizations?

Mr. QUINLAN. That is done by the Governor with some guidance from the council, in terms of population size. I think, as was mentioned earlier, there are some issues in the State oi Maine. Jurisdictions 200,000 or above in population have an automatic certification for a service delivery area. Beyond that, though, the Governor and the State council are participating in the formation of those service delivery areas and there appear to be approximately 580 service delivery areas to be formed under JTPA, which is about a hundred and some odd more than existed under the CETA program.

Mr. SPRATT. This was nationwide?

Mr. QUINLAN. Nationwide, yes, sir.

Mr. SPRATT. What specific efforts have been taken to involve target groups and representation on PIC's?

Mr. QUINLAN. It is hard for me to respond specifically to that since, really, part of our mission in this overall program is to try to get out and educate and encourage the business community to participate. Normally speaking, we have taken the stance that the most difficult task is to get the business community to come up and participate as volunteers, and we hope to have up to 11,000 business volunteers on the private industry councils when they are fully formed.

That being the most difficult task, that is where we have directed our attention. Typically, many of the other groups are petitioning to participate. So that is where we in NAB have focused.

Now, there are some statutory provisions for various groups to be represented, and it is the responsibility of the Governor and the local elected officials to form the private industry councils initially, and that is where that responsibility rests.

Mr. SPRATT. From the Governor's office?

Mr. QUINLAN. And the local elected officials who do the initial nominations of the local private industry councils.

Mr. SPRATT. Among the 80 PIC's that make up your group, are you finding rather widespread criticism of the composition of these PIC's, or is this sporadic and just occasional?

Ms. REITANO. There has been no criticism that I know of as far as the composition.

Mr. SPRATT. Is the membership of your group growing, the National Association of PIC's? You said you had 80. There are some 500-odd eventually to be formed and certified. So you still represent a distinct minority?

Mr. KNIGHT. I will answer that.

Most of those PIC's are just coming on line right now, and we are going to just wait and see what happens.

Mr. SPRATT. This was a voluntary movement among interested PIC's?

Mr. KNIGHT. It is voluntary, but there is associated with it——

Mr. SPRATT. Is the Federal Government sponsoring the formation of a nationwide PIC group?

Mr. KNIGHT. No one in the Federal Government, to my knowledge.

Mr. SPRATT. Do you think it would be helpful if this organization could be promoted under Federal or national auspices so that you could share observations, information and experiences?

Mr. KNIGHT. In my judgment, the support for national groups should come out of local PIC's.

Mr. SPRATT. I take it that this sort of federation is not mandated or called for even if contemplated in the statute.

Mr. QUINLAN. No, sir; not to my knowledge. I think it is important to stress the term "partnership," though, because you have the business community, you have the various elements of the public community, State and local government. You have education. You have community-based organizations. They are all important players. So if there were two entities, I think they should represent all of those organizations.

There have been discussions independent from the Federal Government about some way to coalesce various groups. I suspect over time that that will happen. One, because Americans like to organize into national organizations; and, two, because I think there is a real need to do that.

Mr. SPRATT. The question I was pursuing was whether or not the Federal Government ought to promote it or at least propose the idea. It seems a little odd to me that you have got 500-odd organizations, each in its separate orbit, trying to discover and reinvent its own wheel.

Mr. QUINLAN. One of the things that is important to note is the Labor Department is providing assistance to a range of organizations and to a number of groups that comprise the council, so that information sharing, such as the clearinghouse that the National Alliance of Business runs, is available to anybody throughout the system. This avoids reinventing wheels.

We put out monthly publications on exemplary programs. We have a data base of several thousand exemplary programs that people can tap into. So the issue of reinventing the wheel is a very real one and I would hope that we would not find ourselves in that situation.

Mr. SPRATT. One final question. I was asking what the gentleman from San Francisco said about formation of the PIC as a 501(c)(3) qualified organization, and the expansion of that particular PIC as a vehicle for other nonfederally sponsored programs.

Are you finding this to be the case throughout the country?

Mr. QUINLAN. It varies substantially. Private industry councils were formed originally in 1978 and a number of them chose to be nonprofit organizations. One of the prime examples that I could give as an ideal private industry council is in Boston where that private industry council was incorporated as a 501(c)(3), corporation able to receive contributions from private firms, and had done so from foundations, as well. That council normally runs effective programs in conjunction with the city officials in Boston, but they have also been instrumental in working out a negotiation between the business community and the school community called the Boston Compact where the business community commits certain resources including jobs to help improve the schools, and the schools, in turn, commit better products; that is, better attendance, better scores, and things of that nature.

That, I think, is a logical extension of a private industry council. Once you get beyond the point of dealing with those individuals who have dropped out of school and need various kinds of services, you begin to realize that the school systems have basic problems and you are always going to be dealing with those who have not made it through the system unless you have an opportunity to impinge on the system itself. That was done there.

Ms. REITANO. We are an incorporated PIC as well, and one of the best things that I think it has brought about is not only attraction of other dollars, both Federal, private, and local funds, but it has been a two-way street. First of all, it has widened the awareness of the PIC in our community because it has involved a variety of programs. It has also made the PIC more aware, as Mr. Quinlan just said, about not working in an environment of just administering these dollars. There is nothing wrong with that.

But, in our case, it has definitely opened up other avenues and it has brought in the ability to deal with other issues a lot more clearly to our members. I think it has been very beneficial in our case, but in every case it may not be appropriate.

Mr. SPRATT. Thank you very much.

Mr. FRANK. Thank you.

Just two final questions before you leave.

You said, Ms. Reitano, that the service fee is paid to participating PIC's in your organization. Does that come from JTPA money?

Ms. REITANO. It has been allowable under CETA funds, and it has not been prohibited from JTPA funds.

Mr. KNIGHT. We are currently reviewing the funding policy of the organization. It was an acceptable cost under CETA. Individual areas of buying information and technical assistance with the payment of that fee, and CETA funds were an acceptable source for those payments.

Mr. FRANK. Is it unclear whether it is going to be allowable under JTPA, or what is the status?

Mr. KNIGHT. To my knowledge, it would be acceptable to purchase services under JTPA.

Mr. FRANK. Are people now paying you under JTPA funds?

Mr. KNIGHT. They don't have JTPA funds.

Mr. FRANK. So what you get is still out of the CETA funds?

Mr. KNIGHT. Yes.

Mr. FRANK. Mr. Quinlan, I appreciate the role that the NAB has played in getting business to cooperate, but I guess I would not want the record to stand as if this was solely a favor the business community was doing for the rest of us. I assume that if the program works well, there is an end product for the business community which is better trained workers.

I am told by various members of the business community in certain occupations and certain places that they have shortages of trained people so that if this program works well, presumably the business community would be among the major beneficiaries in that they would have publicly trained workers who are then available to work for them and are more productive and better workers.

Mr. QUINLAN. Mr. Chairman, if I left that impression, it is an incorrect impression. It is very clear that the message we are giving to the people coming into the private industry councils is that this is not a social good. It is an economic necessity for them as participants in the economic system that they have effectively trained people. I think that that message is very clear.

Our international competition brings this to our attention. Beyond that, I think the understanding is also very clear that it is social dynamite to have large numbers of unemployed people without skills.

Mr. FRANK. Thank you.

Next we will hear from Mr. Markley Roberts, who is an economist from the AFL-CIO.

STATEMENT OF MARKLEY ROBERTS, ECONOMIST, AFL-CIO, ACCOMPANIED BY MICHAEL ARNOLD, CHAIRMAN, AFL-CIO DEVELOPMENT INSTITUTE

Mr. ROBERTS. Mr. Chairman, my name is Markley Roberts. I am an economist at the AFL-CIO. I am accompanied by Michael Arnold, who is the chairman of the AFL-CIO Human Resoruces Development Institute.

I would like to commend the subcommittee for conducting these oversight hearings at this critical time in the implementation of the Job Training Partnership Act. Policies are being put in place now that will have a profound effect on the JTPA system to meet the needs of this Nation's unemployed and unskilled citizens. Congress must keep a close watch over these implementation policies to make sure they are fully consistent with the objectives of this important legislation.

We believe the administration has gone too far in abdicating from the legitimate Federal role in job training. I serve on an advisory committee to the Employment and Training Administration of the Department of Labor, an advisory committee on the implementation of the Job Training Partnership Act. This advisory committee has met twice in the last 6 months, and one of the things that has emerged at both these meetings from most of the 30-odd members of the committee is a clear perception or expression of a need for more advice and guidance and leadership from the Federal Government. There is a fear both at the State level and at the service delivery area level that future audits may cause problems which could have been foreseen if there had been more advice and leadership from the Federal Government earlier in the game.

We have high unemployment now. High unemployment will be continuing through most of this decade. The current recovery is not going to eliminate our problems with high unemployment. And these problems are national problems. They cross State and local boundaries. And, therefore, it is appropriate that JTPA recognizes unemployment as a national problem requiring national solutions.

Congress has made a national commitment by passing this law. To fulfill that commitment, we need strong Federal leadership, and it is important and vital that the U.S. Department of Labor provides the leadership and guidance needed to make the JTPA system succeed. Certainly, the area of performance standards is one where Congress intended the Federal Government to take the lead responsibility. In the law, Congress called for criteria to measure the Nation's investment in human resources.

The uniform national system of performance standards is clearly needed if we are to measure the return on our work training investment. Without such a national system of reporting and performance standards, we will not be able to determine which training approach has worked best and which failed to justify continued funding. Nor will it be possible to use JTPA experience to assess the broader policy implications of employment and training programs so that judgments can be made on future policy directions.

For JTPA programs to be accountable to Congress and to the people of this Nation, we must have the informational tools to measure what they accomplish. Therefore, we are supporting the general approach of the Department of Labor to national reporting requirements under JTPA. We regret that OMB is not in agreement with the Department of Labor on this point. The President of the AFL-CIO has expressed his concerns about the need for national reporting requirements to the Director of the OMB, and that letter from Mr. Lane Kirkland to David Stockman is attached to my statement. President Lane Kirkland has urged that OMB take no actions that would further undermine the Federal Government's role in employment and training.

The vast size and complexity of the JTPA system adds to the urgency of a nationally uniform information system. Under CETA, it was hard enough to keep track of the performance of more than 400 prime sponsors. Now we may have service delivery areas numbering almost 600. That will be very difficult to make sure that all these programs meet the high standards mandated by the act, unless there is a uniform system for gathering and reporting information on all these local programs.

Another thing we are concerned about is the lack of effective Federal leadership on JTPA. We are concerned about the implementation timetable. States and localities are far behind the schedule originally set for them. We are convinced that with more direct leadership and a little more imagination on the part of the U.S. Department of Labor, the States would be moving much more quickly to implement their programs for displaced workers.

Money appropriated last winter to get people back to work is sitting around unspent because so many States have been slow to obligate their JTPA title III funds. This situation is truly shocking.

We are concerned. The AFL-CIO has serious concerns about the manner in which JTPA is being implemented. Nevertheless, let me emphasize that we are working vigorously to make sure the new law succeeds. Last February, the AFL-CIO executive board directed AFL-CIO affiliates to take an active role in JTPA programs in their communities.

The federation is working through its Human Resources Development Institution to support the implementation of JTPA. HRDI is engaged nationwide in activities to help labor organizations become more informed and effective partners in the new training system.

With your permission, Mr. Chairman, I would like to put a little brochure into the record which tells about some of the activities.

Mr. FRANK. Without objection.

[The brochure follows:]

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2319 Hampton Avenue, Room 105
St. Louis, Missouri 63139
314/644-0322

Illinois
Indiana
Missouri*

Handicapped Placement Program Offices

305 W. Monument St., Suite 104
Baltimore, Maryland 21201
301/727-5450

2506 Sutherland Street
Houston, Texas 77023
713/923-1255

175 Aurora Avenue
St. Paul, Minnesota 55103
612/292-9193/9242

2800 First Avenue, Room 220
Seattle, Washington 98121
206/623-6696/98

HRDI

AFL-CIO HUMAN RESOURCES
DEVELOPMENT INSTITUTE

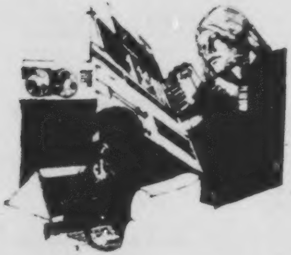
ORGANIZED LABOR—
WORKING FOR PARTNERSHIPS
IN JOBS AND TRAINING

What is HRDI?

HRDI is the employment and training arm of the AFL-CIO. Since 1968, HRDI has been working to bring the resources of the American labor movement to bear in reducing unemployment and extending job and training opportunities.

HRDI operates under a convention mandate from the AFL-CIO. Its charge is to strengthen this nation's employment and training programs for the unemployed and the disadvantaged.

HRDI's mandate translates the deeply rooted commitments of the labor movement into action — to bring us closer to the day when every American will have a chance to work at a decent job.



Working toward Full Employment

As labor's employment and training arm, HRDI helps concerned unions join hands with employers and government to meet the needs of the nation's unemployed.

HRDI offers technical services to labor organizations across the country to help them assume a strong partnership role in the design and operation of training programs for jobless persons.

HRDI also operates special programs to help labor respond to the needs of the unemployed.

For workers who have lost their jobs in mass layoffs and plant closings, HRDI has initiated a special displaced worker program in cooperation with affected unions. Several thousand dislocated workers have participated in innovative workshops conducted by HRDI and their unions to learn how to cope with their job loss and find new jobs.

The experience HRDI has gained in providing services to displaced workers will serve as a model for future programs. In addition, HRDI is exploring new approaches for fostering labor-management cooperation to assist workers in facing layoff.

HRDI's Handicapped Placement Program focuses on the employment needs of the disabled. Through special offices in four cities, HRDI is developing new labor-involved services to assist this group.

Enhancing Labor's Role in Training

The enactment of the Job Training Partnership Act of 1982 (JTPA) has heightened the importance of effective labor participation in training programs at the state and local level. HRDI is working to help labor make the most of its opportunities under the new act, so labor groups can help shape the training programs in their communities.

HRDI recognizes that labor has traditionally performed a central role in preparing workers for jobs in the private sector. With JTPA's emphasis on private sector employment, HRDI is seeking to assure that labor resources are appropriately utilized in training programs established under JTPA.

To assist labor organizations in becoming informed and effective partners in JTPA, HRDI prepares and disseminates timely informational materials on employment and training issues. HRDI also prepares information on exemplary labor-involved training and employment programs, as models for future labor activities.

In addition, HRDI conducts educational conferences and workshops on training issues for labor leaders and others interested in enhancing labor's partnership role in the JTPA system.

Mr. **Roberts**. I think we should make it clear that in the references in the law and the implementation of the law we consider the labor movement a part of the private sector. There are many references to the private sector both in the law and in the implementation of regulations, and we think it should be recognized that the labor movement is a part of the private sector.

Mr. Chairman, we appreciate this opportunity to make these comments. I want to assure this subcommittee that the labor movement stands ready to assist in any way in making sure that the new JTPA training system is fully accountable to the Congress that created it.

Thank you.

[The prepared statement of Mr. Roberts follows:]

STATEMENT
BY
MARKLEY ROBERTS, ECONOMIST, AFL-CIO
TO THE
MANPOWER AND HOUSING SUBCOMMITTEE,
HOUSE COMMITTEE ON GOVERNMENT OPERATIONS

JOB TRAINING PARTNERSHIP ACT OVERSIGHT HEARINGS

JULY 12, 1983

The AFL-CIO would like to commend the Committee on Government Operations for its initiative in scheduling oversight hearings at this critical time in the implementation of the Job Training Partnership Act. Although the new legislation does not formally go into effect until nearly three months from now on October 1, policies are being put in place now that will have a profound effect on the ability of the new JTPA system to meet the needs of this nation's unemployed and unskilled citizens. It is crucial that Congress keep a close watch over these implementation policies to assure that they are fully consistent with achieving the objectives of this vital piece of legislation.

Unemployment continues to be a serious problem of national proportions. In June, some 11.1 million people remained out of work. Another 1.7 million individuals were too discouraged to look for jobs. For our minorities and disadvantaged citizens, these high unemployment rates aggravate already-difficult employment barriers.

Those unemployment problems cross state and local boundaries. They are truly a national concern. For that reason, it is highly

APPROPRIATE THAT JTPA RECOGNIZES UNEMPLOYMENT AS A NATIONAL PROBLEM REQUIRING A NATIONAL SOLUTION. THROUGH JTPA, CONGRESS HAS MADE A NATIONAL COMMITMENT TO THIS COUNTRY'S EMPLOYMENT AND TRAINING NEEDS.

TO FULFILL THAT COMMITMENT REQUIRES STRONG FEDERAL LEADERSHIP. IT IS VITAL TO ASSURE THAT THE U.S. DEPARTMENT OF LABOR PROVIDES THE LEADERSHIP AND GUIDANCE NEEDED TO MAKE THE JTPA SYSTEM SUCCEED.

CERTAINLY THE AREA OF PERFORMANCE MEASURES IS ONE WHERE CONGRESS INTENDED THE FEDERAL GOVERNMENT TO TAKE THE LEAD RESPONSIBILITY. IN ENACTING THE NEW TRAINING LAW, CONGRESS STATED THAT "JOB TRAINING IS AN INVESTMENT IN HUMAN CAPITAL.....IN ORDER TO DETERMINE WHETHER THAT INVESTMENT HAS BEEN PRODUCTIVE, IT IS ESSENTIAL THAT CRITERIA FOR MEASURING THE RETURN ON THIS INVESTMENT BE DEVELOPED."

A UNIFORM NATIONAL SYSTEM OF PERFORMANCE MEASURES IS CLEARLY NEEDED IF WE ARE TO MEASURE THE RETURN ON OUR TRAINING INVESTMENT. WITHOUT A NATIONAL SYSTEM OF REPORTING AND PERFORMANCE STANDARDS, WE WILL NOT BE ABLE TO DETERMINE WHICH TRAINING APPROACHES WORK BEST AND WHICH FAIL TO JUSTIFY CONTINUED FUNDING. NOR WILL IT BE POSSIBLE TO USE THE JTPA EXPERIENCE TO ASSESS THE BROADER POLICY IMPLICATIONS OF EMPLOYMENT AND TRAINING PROGRAMS -- SO JUDGMENTS CAN BE MADE ON FUTURE POLICY DIRECTIONS. FOR JTPA PROGRAMS TO BE ACCOUNTABLE TO CONGRESS AND THE PEOPLE OF THIS NATION, WE MUST HAVE THE INFORMATIONAL TOOLS TO MEASURE WHAT THEY ACCOMPLISH.

We were distressed to learn that the Office of Management and Budget is not in agreement with the Department of Labor on this point. President Kirkland has expressed his concerns about the need for national reporting requirements to OMB Director David Stockman. President Kirkland also urged that OMB take no actions that would further undermine the federal government's role in employment and training. I am including a copy of his letter to Mr. Stockman with my testimony for your information and review.

The vast size of the JTPA system adds to the urgency of a nationally uniform information system. Under the Comprehensive Employment and Training Act, it was hard enough to keep track of the performance of more than 400 prime sponsors. Now it appears that under JTPA the number of service delivery areas may approach 600. It will be a real nightmare trying to assure that programs meet the high standards mandated by the act unless there is a uniform system for gathering and reporting information on all these local programs.

Another area where we are concerned about the lack of effective federal leadership on JTPA is in the implementation timetable. The states and localities are far behind the schedule originally set for them.

Money appropriated last winter to get people back to work is sitting around unspent because so many states have been slow to obligate their JTPA Title III funds. This situation is truly shocking. We are convinced that with more direct leadership by the U.S. Department of Labor, the states would be moving much more quickly to implement their programs for displaced workers.

The AFL-CIO has its serious concerns about the manner in which JTPA is being implemented. Nevertheless, let me emphasize that we are working vigorously to make sure the new act succeeds.

Last February, the AFL-CIO Executive Board strongly endorsed JTPA and directed AFL-CIO affiliates to take an active role in JTPA programs in their communities. The Federation is working through its Human Resources Development Institute to support the implementation of JTPA. HRDI is engaged nationwide in activities to help labor organizations become informed and effective partners in the new training system.

We appreciate this opportunity to comment on JTPA implementation. I want to assure this committee that the labor movement stands ready to assist in any way in assuring that the new training system is fully accountable to the Congress that created it.

American Federation of Labor and Congress of Industrial Organizations

815 Sixteenth Street, N.W.
Washington, D.C. 20006
(202) 637-5000

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July 7, 1983

Honorable David Stockman, Director
Office of Management and Budget
New Executive Office Building
Washington, D.C. 20503

Dear Mr. Stockman:

The AFL-CIO supports the Department of Labor's concept of national reporting requirements for programs under the Job Training Partnership Act. We wish to emphasize our concern that no actions be taken that would further diminish the federal government's active involvement in maintaining an effective national employment and training system.

In enacting JTPA last fall, Congress reaffirmed a basic federal government responsibility for employment and training policies and programs, even though certain administrative responsibilities were delegated to the 50 states. The training system established by JTPA will serve as a means of achieving national employment goals, including the objective of helping workers adapt to the new realities of the workplace. Through JTPA, Congress also acted to enhance employment opportunities for our disadvantaged citizens.

To assure that the training system meets those national goals, the federal government must develop procedures to monitor and oversee the performance of programs in the 50 states. Uniform performance measures are vital in assuring the programs' accountability to Congress. Furthermore, these performance measures are indispensable for a true assessment of JTPA policies and programs and the development of future policies that effectively address the needs of this nation's jobless and unskilled.

These policy goals necessitate a uniform national system of reporting and performance standards. No actions should be taken that would further undermine the federal government's role in employment and training policy. I trust that as your office reviews the Department of Labor's proposal, you will recognize its basic importance to the training system established by the Job Training Partnership Act.

Sincerely,

Lane Kirkland

President

cc: Secretary Raymond Donovan

Statement by the AFL-CIO Executive Council

on

Job Training

February 24, 1983
Bal Harbour, Fla.

Plant closings, major layoffs, worker dislocations and shifting skill requirements vastly increase the need for an effective national job training effort to supplement job-creation programs.

National employment and training policy must fully address the retraining and relocation needs of displaced and disadvantaged workers. In order to help older workers who face discrimination in obtaining training and new jobs, the Age Discrimination Act must be effectively enforced.

The recently enacted Job Training Partnership Act, now the vehicle for this nation's meager job training efforts, calls for cooperation among labor, employers and government at the federal, state and local level in planning and operation of training programs. Federal funding for training under JTPA, especially the dislocated worker program, should be greatly increased.

The AFL-CIO rejects Administration proposals to raid depleted unemployment insurance funds for money to provide education or training vouchers for jobless workers. We urge Congress to establish clearly the right of all persons drawing unemployment insurance benefits to enroll in approved education and training without losing their benefits. Some states now allow such enrollment but Congress should guarantee this opportunity to unemployed workers in all states.

The AFL-CIO calls for effective labor participation in JTPA programs with full labor representation on local Private Industry Councils and State Job Training Coordinating Councils. We also urge AFL-CIO-affiliated organizations to participate in planning and operating JTPA programs in their communities to make sure that federal training funds will help participants acquire useful skills and obtain decent jobs. In this effort we urge affiliates to use fully the technical resources of the AFL-CIO Human Resources Development Institute.

Mr. **Frank**. Thank you, Mr. Roberts.

Mr. McKernan?

Mr. **McKernan**. In your testimony, I see a copy of the letter of Mr. Kirkland to David Stockman. What was it that made Mr. Kirkland decide to write to OMB, which was basically last week, as I understand?

Mr. **Roberts**. Well, we became aware that there was a reluctance on the part of the OMB to allow the Labor Department to go ahead in setting the standards, and we felt they—we are not always supporters of what the Labor Department does—but in this case, we felt that the Labor Department was moving in the right direction on performance standards and reporting.

Mr. **McKernan**. How did you become aware that there was a problem at OMB?

Mr. **Roberts**. I can't answer that. I don't know.

Mr. **McKernan**. Do you know whether anybody at AFL-CIO has talked with people at OMB about their reluctance on the performance standards?

Mr. **Roberts**. I don't know, sir.

Sir, just a moment. Mike Arnold has a comment.

Mr. **Arnold**. If I might, the AFL-CIO has had a number of people on vacation last week, with the Congress in recess. As director of HRDI, the employment training arm of the AFL-CIO, I am in contact on a day-to-day basis with other people involved in employment and training issues. This is something that certainly we have been following very closely as part of the ongoing transition to JTPA.

There is a real interest and concern on the part of the labor movement to make sure there is appropriate data collection in the period ahead. We have a particular problem in the labor movement in really tracking what happens out there. There is great concern about the labor standards issue with the ultimate implementation of JTPA. We had enough problems with some 470 prime sponsors under CETA in trying to track the developments. And with as many as 580 service delivery areas under JTPA, we think it would be a real nightmare to leave it up to the States with 50 or more separate performance standards being established.

It was an issue that was of concern, and President Kirkland felt compelled to make that point to Mr. Stockman.

Mr. **McKernan**. I assume that most of us at least in this room would agree that there ought to be some national performance standards, and I guess the chairman and I are concerned as to why it is OMB does not seem to be one of those who agree with that.

Do you have anything from the rumor mill that we talked about earlier as to why OMB has not taken action?

Mr. **Arnold**. No; there has not, to my knowledge, been any direct contact with OMB or Mr. Stockman on this issue other than the rumors and the general perception that OMB is not supportive of the Labor Department's position.

Mr. **Roberts**. I might add to that point that it has been clear in the meetings of this task force that the position of the administration was to leave as much as possible to the States and to leave the maximum—maybe even glossing on the law and interpreting, I think—adding an interpretation to the law which is not there, that there is a strong desire on the part of the administration to leave as much as possible to the States and that what one might call a States' rights philosophy may lie behind the OMB position.

Mr. **McKernan**. Well, I happen to be one who concurs with that States' rights philosophy. But I think that in a mobile society that you need to have some standards that are being set by which to judge those State programs so that those who do travel from one State to another are going to have some skills. The Federal Government donors will be involved in the program.

What I want to find out from OMB—and I am sorry they are not going to be testifying at this hearing—is why they feel that the national performance standards somehow jeopardize States' rights, because, in my view, that is the way a program ought to be implemented, to judge those State programs and make sure they do meet the standards so that we are able to find out what skills are needed and whether or not people have those skills for the jobs that are available in our society.

I have no further questions.

Mr. **Frank**. Thank you.

I also regret OMB's not being here. We asked them to come, as I said earlier, and they said they did not want to come until after July 26, which is when the 90 days run out on their period under the regulations. So those who are looking for a prompt response can draw no comfort from that. I regret their apparent unwillingness to talk to anybody about this. It is a little unseemly for us all to be sitting here wondering, guessing, asking each other what we have heard about the Federal Government.

I would rather have had them here. Criminology is bad enough, but OMB'ology is not appropriate. I really think there is a failure here.

Mr. Quinlan suggests it is not new for OMB, but something that he was familiar with earlier. But it is just not the right way to run things.

Mr. Roberts, let me ask you, on the question of representation you make a very good point about the private sector and organized labor being a very important part of that private sector. The price of getting this bill through, getting a bill that the President would sign, one piece of that was a 51-percent business representation.

What has been the AFL-CIO's experience with regard to adequate representation for other interests in the PIC's which will administer this program?

Mr. **Roberts**. Well, I would like to ask Mr. Arnold to respond to the question of labor participation.

Mr. **Arnold**. What HRDI has been doing since last summer and with the passage of JTPA is to first inform the labor movement about the changes in JTPA versus CETA, and to prepare them for a partnership role and active involvement in the implementation. We have experienced since that time a surprising interest in JTPA that we did not see during the early days of CETA. We have various labor organizations and labor leaders within communities around the country all opting to be on these bodies.

What we have done and where we have placed our focus is on the State AFL-CIO bodies around the country. We have felt that with the new authority of the Governors, there ought to be a commensurate increase in the role of the AFL-CIO federations within the States. And we have worked very closely with a number of major national and industrial unions who have also encouraged their affiliates at the State levels to become involved.

What we are concerned about is not necessarily what labor representative serves on these bodies or what union they represent, but getting a representative on there that can commit the time and become knowledgeable about it and serve the broadest possible interest of the labor movement within the States on the SJTCC's and, likewise, at the local level on the PIC's. That is going to be very difficult.

HRDI, with the limited resources it has, is in the process of training labor representatives on the SJTCC's and on the PIC's. If you get outside of more than 150 major metropolitan areas around the country, you have a very difficult time identifying labor representatives who can commit the kind of time necessary. So we have increased our information dissemination.

We have sent a great deal of information to the 50 State AFL-CIO's as well as some 600 local labor councils to assist them in identifying and making nominations of people to serve on these bodies. In those areas where there are good political relationships and at least communication things are going very well, and the Governors, in the appointments to the SJTCC, and local elected officials, in the case of the PIC's, are responding.

In other areas, they are disregarding nominations that have been sent forward by those labor organizations like the central labor councils, and it is going to be a real problem.

Mr. **Frank**. Are they putting other labor people on in those cases?

Mr. **Arnold**. In some cases, there are some Governors, because of political or other reasons, who have chosen to disregard the nominations coming from the State AFL-CIO bodies and have reached out and picked a labor representative to serve on the bodies. We think that we may be able to work those problems out.

But the point is that they will not be representing the broad interest of labor within those States.

Mr. **Frank**. I would say if there are cases where there is no significant labor representation and people are not prepared to accommodate some labor representation, we would like to know that. The statute mandates 51 percent for business. I think Congress would be unhappy if there were State and local officials who were ignoring the very important role that organized labor has to play. So that is one of the things that will be of continuing interest to the committee. And I invite you to let us know if there are problems.

Mr. **Arnold**. One of the things, Mr. Chairman, that we are very interested in doing is acting in a proactive way in making sure that labor is involved.

Mr. **Frank**. So no one can say that there were no labor people around; you are anticipating that?

Mr. **Arnold**. Right. As opposed to waiting until there is a crisis situation that is going to dilute the support for the Nation's employment and training system.

Mr. **Frank**. I would take it, Mr. Roberts, that the AFL-CIO agrees with the position that others have voiced here that while this is an important program and we hope it works well, it is hardly the major answer that we need to the problems of unemployment, both because of its own limited scope and because it does not in and of itself do anything to create the jobs. It helps to fill those that are not filled?

Mr. **Roberts**. The only reason I don't enlarge on that point at some length is in the interest of your time. I think you are entirely correct that you can have all the training in the world, but if there are not jobs out there when the people get trained, the people who go through the training are going to feel frustrated and thwarted.

Mr. **Frank**. I appreciate that. It is a point we have to keep in mind. We will try to make this work, but it is hardly the answer to the great bulk of our unemployment problems.

Mr. **Roberts**. Yes, sir.

Mr. **Frank**. Thank you very much, gentlemen. We appreciate it.

Our final witness is Mr. John Fitzsimmons from the Training Resource Center in Portland, Maine, a city we chose at random.

You may proceed, Mr. Fitzsimmons.

STATEMENT OF JOHN FITZSIMMONS, EXECUTIVE DIRECTOR, CUMBERLAND COUNTY TRAINING RESOURCE CENTER, PORTLAND, MAINE

Mr. **Fitzsimmons**. Mr. Chairman and subcommittee members, I have to open by apologizing that I am just getting over the flu and a cold.

Mr. **Frank**. Just pull the mike as close as possible to you, and that will reduce the strain.

Mr. **Fitzsimmons**. I would like to open up by expressing my appreciation for the opportunity to talk to you about the Job Training Partnership Act and how it affects us at the end of the long line from Congress to DOL, to our Governors, and down to the SDA level.

I am John Fitzsimmons, executive director of the Cumberland County Resource Training Center. Instead of reading my testimony, that I would like to submit, I would like to highlight some of the key points.

Mr. **Frank**. Without objection, your entire testimony will be placed in the record.

Mr. **Fitzsimmons**. The Training Resource Center is located in the city of Portland. If you are in the State of Maine, Portland County is considered the largest city in the State of Maine. And if you are from outside the city, that is known as the city that is 15 miles south of L. L. Bean.

Let me give a brief overview of the Training Resource Center and a little bit about my own experience, because I think it is important—my perspective of how we look at the Job Training Partnership Act.

The Training Resource Center is an organization that is the outgrowth of working with the Comprehensive Employment Training Act. Cumberland County has been a prime sponsor for 7 years. We have just been recently designated as a service delivery area under JTPA. Our annual budget is about $2 million, and we serve about 1,300 people per year.

I think one of the features that makes us a little bit different than other prime sponsors is that we have income producing programs. We run professional workshops dealing with management, supervisory skills, communications, computer courses and also the specialized training for businesses. This generates income for our program that allows us to train more of the unemployed. We are nonprofit and the money goes directly back into the program.

I would be remiss if I did not take the opportunity to acknowledge that the Training Resource Center has just been nominated for an award from the National Alliance of Business for its high placement rate of placing disadvantaged people in jobs, and we are very pleased with that acknowledgement from NAB.

Very briefly on things I have done—because it shades my perspective—I worked in employment training programs for 7 years directly for Cumberland County. I am the past chairman of the Governor's Youth Council of Maine, a member of the New England Youth Advisory Group and also a member of the National Youth Practitioners Network. Before I address the three areas of unified data collection, performance standards and MIS, I need to talk about a couple of items that have direct impact on exact things you are here to talk about today.

First of all, the importance of an employment training program, what I see as the strengths and weaknesses of JTPA and the lack of progress or the progress of the implementation schedule of JTPA. In the State of Maine, we have an unemployment rate of 9.6. Although this might be envious of States such as Michigan and Ohio, it does present a serious problem for us. When you see about 5,000 people a year applying to our programs, you know there is a need for some kind of employment training program.

The thing that I think has a direct bearing on what we are measuring today is what is happening with the applicant pool is the economy. Because of what is happening in our economy, the people with higher skills are now forcing the people with lower skills out of their jobs, or they are competing for the same jobs and winning out. This means on a local level that to train the most disadvantaged we must put much more time and money into remedial education, vocational training, attitudinal training, a variety of things to get them at a level to compete with the other people who are now unemployed in our community.

This comes at a time when the performance standards are really reflecting wage gains and cost for placements. I think you are going to see that a lot of programs are going to have to gear down and put a lot of money to remedial education. We have found that out during the course of this last couple of years.

Second, I would like to summarize what I think are some of the strengths and weaknesses.

No. 1, you have the support of the President, the House and the Congress, and I that is key to keeping this program going. Hopefully that support will be translated into funding levels that are at least the 3.7 billion level of CETA. It is crucial to continue that.

With the new formula, 22 percent stays up in the Governor's office. That means that there is less money getting down to the service areas, 78 percent. You will see a difference in the number of people we serve because of that.

Another real strength of the program is that it is an exclusive training program. It is not coupled with public service employment.

I think JTPA would be tarnished as CETA was if you couple a public service employment bill with that. There should be a separate thing if it becomes needed in certain areas, but please keep it separate from JTPA.

Among the most glaring weaknesses, and it directly impacts the performance standards, is the restriction or the tight restrictions on paying allowances and stipends. If you are looking at high tech jobs, you are talking about a minimum of 6 months of training. How are you going to keep the economically disadvantaged enrolled in those programs without some kind of income coming in?

What I see probably will happen is we, the program people, will turn to shorter term training that will lead to lower wage gains on the part of the participants. It is a natural outcome. If you are talking about a machine tool that goes 6 months, it is going to be very difficult to keep someone enrolled in that program without income for that period of time.

Finally, let me address, before I turn to the three areas you have asked me to talk about, the implementation schedule.

Let me relate that as happening in New England. Four out of six States are still involved with service delivery designations or in appeals. We are far behind in schedule. My editorial comment would be that the revolution began in New England, and I think that it is rightly so.

We are fiercely independent. Most of us have been in the business of running employment training programs for 6 and 7 years, and we were not about to be pushed aside from Congress, DOL or Governors, so people were fighting very hard to stay involved with delivering services.

I think New Hampshire is the perfect example of the shot that was heard around the employment and training world. New Hampshire applied to be a service delivery area under their Governor and was denied; applied to Secretary Donovan and was denied. The counties have now banded together and are in Federal Government. Their case will be heard August 3. The rest of New England is watching very closely.

The important thing about the implementation schedule as it affects what you are reviewing is that it has put all those key areas of unified data collection, performance standards and MIS on the back burner while people are in the heated battle trying to become SDA's. They are not examining closely the issues that will deal with the accountability of this program.

Let me move now to talking about the unified data collecting. It is interesting. I am a programs person but I have to admit when you devise the data collecting system, you are really driving the system. You are kind of announcing with the goals that you are expecting, and consequently, the programs have to follow suit if they are going to be measured accordingly.

So it is crucial that you have unified data collecting and that it is a nationalized system. It will give you the data you need to analyze, assess and make any changes in the program you deem necessary.

Let me comment on one of the reports that will be used. First, it is the quarterly status report which has been issued, and that has been approved, to the best of my knowledge.

It is a very simple form and it seems extremely appropriate. That would be my only comment.

The annual status report, as simple as the quarterly status report is, the annual status report is very complicated. Although a lot of the data they are asking to collect is very important and would help you in your analysis, I have several concerns.

Foremost, the administrative burden it places on programs for accounting for the expenditures on youth. As you know, under JTPA, that 40 percent of the funds should be spent on youth. But as an administrator, I will tell you that is a fiscal nightmare accounting for that.

Let me give you an example. If you were to have one youth enrolled in a machine tool course with nine other adults, you must prorate the cost. You must prorate the time the counselor has spent, materials and anything else that is used on that particular individual. This becomes a fiscal nightmare.

You know we are being reduced from 20 percent in CETA to 15 percent in JTPA. It would be most difficult to account for that.

I realize youth have severe barriers in finding employment. I think an easy answer to that would be to just have 40 percent of all programs enroll youth so that programs would not play numbers games and put 800 youth in an inschool program that only costs $100 per student, and thus you would never have a clear reflection that 40 percent of the funds were spent on youth.

I think you could easily say that 40 percent of all the training funds, enrollments and programs such as on-the-job training, a vocational education program would enroll youth. Thus you would have the accountability you need without putting us through the fiscal nightmare.

You must remember that the reduction in funds is coming twofold. It is going from 20 percent to 15, but the SDAs, the service delivery areas, are receiving less money than they did the year before. So it is even less and would be more difficult to account for this.

I would like to talk about a couple of other concerns on the annual status report, a couple of things that I think are missing that you should know.

I did not see anywhere on the report where it reflects the number of economically disadvantaged on the program. As you know, there is a 10 percent window that people with other significant barriers can be enrolled in the program. I think it would be an important thing to measure that, how many were disadvantaged in the programs, and I did not see this on the annual status report.

Another key thing is on the section of the annual status report that deals with youth, employability and enhancement determination. This is basically where Congress was allowing the program operators to offer other options for youth instead of direct placement, but there were four terminations on this report. (*a*) Is entered in on title II training; (*b*), return to full-time school; (*c*), ages 14 and 15 complete program objectives; and (*d*), complete major level of education.

My concern is part C. It is limited to 14- and 15-year-olds. One of the things as a program operator dealing with a lot of youth programs in New England, there are some excellent programs for people between the ages of 16 and 21 that really do not deal with employment as the outcome. Many of these youth sometimes having records, exoffenders or high school dropouts, need a variety of services to just get them at the level of maturity that would allow them other options.

I think my personal opinion is that it would be a mistake to only allow 14- and 15-year-olds to go through that category called program completers. I think there are people between the ages of 16 and 21 who would benefit by such programs and then maybe in 6 or 7 months after completing that program, they would be in a position to return to school or enter other job training programs.

One other point with the annual status report, I really don't believe that under the section about follow-up information that recording the wage gain after 13 weeks is realistic. The people we are talking about placing in jobs at the end of 3 months, I don't anticipate that they will be getting significant raises. I think you should probably turn to 6 months or to 1 year to analyze that.

In the area of performance standards, I think they were very generous—they being the Department of Labor—in taking into account the benchmarks should reflect the local economy. I think that was a very fair way of reviewing it.

My concern is in the area of youth competencies. If the MIS unified data collection is on the back burner, youth competencies has not even made it on the stove.

What I would think would be best is under CETA, under the consolidated youth employment program, the exact competencies you want to measure, that being basic educational skills, job skills, and work maturity skills, have already been worked on under the consolidated youth employment program. I believe you could use that as a basis to establish some kind of national standards and performance of youth competencies.

One other thing that might not be held in concert with some of my other youth folks, people working youth programs, would be I would like to see these youth companies standardized.

I think youth moving from Massachusetts to Maine or from Maine to New Hampshire having some kind of national certification of these standards would allow them to present the certificate of dealing with basic skills or work skills or job skills on to the next employer in the State and have it recognized. This would allow them to say "I have accomplished skills," and it can be used.

This is not, to my knowledge, being considered at this point. It really is being looked at as a separate State issue and thus I do not think it will be transferrable.

In New England where we cross borders in places, I think this could be very beneficial for youth presenting to the employers.

In closing, I guess I would like to thank you for the opportunity to present some of my thoughts. As I said, we are at the long end of the line from Congress down to the actual people applying to the programs.

I respect that you are going out and looking for different sources and different perspectives on the Job Training Partnership Act.

I would be available for any questions if you have any.

[The prepared statement of Mr. Fitzsimmons follows:]

TESTIMONY OF JOHN FITZSIMMONS

EXECUTIVE DIRECTOR OF CUMBERLAND COUNTY TRAINING RESOURCE CENTER (TRC), CUMBERLAND COUNTY, MAINE, BEFORE THE HOUSE GOVERNMENT OPERATIONS SUBCOMMITTEE ON MANPOWER AND HOUSING.

JULY 12, 1983

I am John Fitzsimmons, Executive Director of Cumberland County Training Resource Center which is located in Portland, Maine. I thank you for the opportunity to address this committee regarding implementation of the Job Training Partnership Act (JTPA), specifically the status of unified data collection, performance standards, and Management Information Systems (MIS). I would like to begin by relating some of my experience in employment and training.

The Cumberland County Training Resource Center (TRC), an organization that is an outgrowth of the county's involvement with the Comprehensive Employment and Training Act (CETA), administers over two million dollars of CETA funds as well as conducting professional development seminars, computer courses, and running a computerized remedial education center. These additional services are income producing and allow TRC to serve more of the county's unemployed. I have worked for Cumberland County for the past seven years exclusively in employment programs. I was the past chairman of the Governor's Youth Council of Maine, a member of the New England Youth Programs Advisory Group and a member of the National Youth Practitioners' Network.

In order to effectively address the three areas that this committee is reviewing today, I need to articulate the importance of employment and training programs; strengths and weakenesses of the Job Training Partnership Act, and progress or lack of progress in the JTPA implementation schedule. First let me address briefly the importance of an employment and training program from a local level. The unemployment rate in Maine is 9.6%. Although that figure may be the envy of states like Michigan and Ohio, it means discouragement, fear and anger on the part of individuals who make up that statistic in Maine. During the past seven years an average 5,000 people applied to our program each year. I have recently been seeing a change in the applicant pool that reflects the state of the economy. As the job market has tightened, the more highly skilled unemployed have taken lower-skilled or entry-level jobs, effectively shutting lesser-skilled applicants out of the job market. Locally this has resulted in TMC spending more money on remedial education, pre-vocational training and vocational skill training. This comes at a time when the new JTPA performance standards reflect wage gains and cost per placement, ignoring the fact that programs will need to spend more money and resources on improving the employability skill level of enrollees to provide them with the basic skills necessary for success in vocational skill courses or on-the-job training programs.

Second, I will summarize the strengths and weaknesses of the Job Training Partnership Act. Its major strength is that it has the support of President Reagan, the Senate and the House. Hopefully, that support will translate into a funding level that meets or exceeds Fiscal Year 1983's level of 3.7 billion. Another strength is that it is exclusively a training program and not a public service employment program. Coupling training programs with public service employment programs in the past has hurt the credibility of training programs and would open JTPA to many of the same criticisms that CETA received. Among the most glaring weaknesses are the restrictions on payment of allowances or stipends to enrollees attending vocational classes. Most courses in the high-tech field require a minimum of six months training, yet the majority of the economically disadvantaged cannot go six months without some kind of income. Therefore, we are forced to offer shorter term training with resultant lower wage gains.

Finally, I want to advise you on the implementation schedule of JTPA, which has direct effect on the areas you are reviewing. The transition from CETA to JTPA, in so far as New England is concerned, is far behind schedule. Four of the six New England states are still involved in Service Delivery Area designations or appeals. There is a reason why the American Revolution began in New England; it is that "Don't Tread on Me" philosophy. If there was a first shot fired in this battle between the states and local units of government it was fired in New Hampshire. As you might be aware, the counties in New Hampshire applied to be Service Delivery Areas but were denied by their Governor. The counties then appealed to Secretary Donovan and again were denied. The counties have banded together and have taken their case to federal court. While the disputes continue over the structure, intent, interpretation, and implementation of the Job Training Partnership Act, the work on unified data collection, performance standards, and MIS sits on the back burner. As you can expect, there is a direct cause and effect relationship between political fighting now going on and the lack of concrete work being accomplished in the implementation of measures to ensure the JTPA system is accountable.

I will now move on to addressing a unified data collecting system. Reports required by this system establish the goals of the program, monitor the progress of the program and, equally important, measure the success of the program. To measure the effectiveness of JTPA, recordkeeping systems must be timely and standardized. A standardized national reporting system is the only way JTPA will be truly accountable. Such a system will provide Congress with the necessary information for funding levels, program changes and assessment.

Let me first comment on the Quarterly Status Report (QSR), which has been approved and, second on the as yet unapproved Annual Status Report (ASR). The QSR approved for use is extremely simple and seems appropriate. The Annual Status Report is however, as complicated as the Quarterly Status Report is simple. Although this form will provide much useful data from which to measure performance, I have several concerns - the foremost being the administrative burden and additional administrative costs associated with accounting separately for program expenditures on youth and program expenditures on adults. Although Section 203(b) (1) of the Act requires that not less than 40 percent of the funds be used to provide services to youth, expenditures for administration are limited to 15%.

As an administrator I see separate accounting of expenditures for youth as a fiscal nightmare. The best example of the problem is illustrated by following the accounting process necessary for one youth attending a training course that has nine other adults. You must prorate the cost of the course and the amount of time the employment counselor spends with that youth versus time spent with adults in the course and report each accordingly. At a time when administrative funds are being reduced from 20% under CETA to 15% under JTPA you can understand my reluctance to spend more administrative funds accounting separately for funds spent on youth. I would prefer that programs be required to enroll youth at a 40% level with safeguards to prohibit enrolling large numbers of youth in low cost per, in-school programs. From my experience, I would suspect that more than 40% of the funds would be spent serving the 40% youth enrolled in training.

Here are some other concerns I have regarding the ASR:

1. It doesn't reflect the number of enrollees who are economically disadvantaged. The Act allows for 10% of the enrollees to be over-income if they have other barriers to employment. I believe an assessment of the degrees to which this 10% window is used would be useful in reviewing the programs.
2. Under the section "Youth Employability Enhancement Termination", there are four types of termination:
   a) Entered Non-Title II Training
   b) Return to Full-Time School
   c) Age 14-15 Completed Program Objectives
   d) Completed Major Level of Education

I am concerned that part "c" of this section is limited only to youth 14 and 15 years old. This limits and might even prevent some programs from providing training/services for youth between the ages of 16 and 21 years old who are not ready for vocational skill training and/or job placement. I have seen some extremely effective youth programs funded under Title IVA of CETA that might not meet the criteria established under JTPA and thus would probably not be offered.

3. The section "Total Program IV Follow-up Information" requires follow-up information about average hourly wage 13 weeks after termination. I believe the only realistic way to measure wage gain will be at six month and one-year intervals. I cannot foresee JTPA placement wages increasing within three months of obtaining employment. Reviews at six months and one year would provide you with the kind of analysis necessary to measure longer-term effectiveness of JTPA and any given state and/or SDA.

Finally, I want to comment on performance standards. The present regulations covering performance standards seem to have taken into account the most important factor affecting performance, which is adjusting performance benchmarks in relation to local economic conditions. One of the areas that seems to need special attention is standardizing youth employment competencies. There are three competency categories: basic educational skills, job specific skills, and work maturity skills. I believe that the work completed under the Consolidated Youth Employment Program of CETA dealing with these exact competencies could become the basis for a set of national standards. Such standardizing of youth competencies would allow national certification of skills that could be transferred and accepted in different parts of the nation. This would help youths who move to another state by allowing them to present their certification and be recognized for their accomplishments.

In closing, I commend you for this early review of the Job Training Partnership Act and for soliciting input from a variety of sources and perspectives. Again, thank you for the opportunity to speak to this committee. I am prepared to address any questions you may have.

Mr. **Frank**. Thank you, Mr. Fitzsimmons. We appreciate your coming.

Mr. McKernan was particularly eager to get some local representatives and was very supportive of your work.

Mr. McKernan.

Mr. **McKernan**. Thank you, Mr. Chairman.

Let me just follow up on some things because I think you really have been at the forefront of trying to get some various aspects of JTPA implemented ahead of schedule, and I know you have run into some roadblocks.

You spent a lot of time in your testimony talking about some of the problems you see with JTPA as it relates to the youth program, whether it be the 40 percent or the extra paperwork. Is that under the April 26 standards that have been proposed?

Mr. **Fitzsimmons**. Yes. Yes, it has.

Mr. **McKernan**. Have you made any attempt to comment on those standards or to contact DOL?

Mr. **Fitzsimmons**. Yes, we have. It is funny, always somebody wants to complain about paperwork, but I don't think anyone realizes the severity accounting for the 40 percent and especially as it relates to the smaller SDA's, especially rural areas. It is much more difficult.

I do not have a separate youth program where it is easy to account for what everyone is doing. Most things are shared duties and you have to come up with sophisticated accounting systems to report that, and that is going to cost a lot of money to do that.

Mr. **McKernan**. Has any national organization or DOL or the State, for that matter, tried to come up with software that would be necessary to put all that on the computer?

Mr. **Fitzsimmons**. I am not familiar with that, no. I know my State is considering having an MIS dealing with participants' enrollments, not actually fiscal expenditures on a computer system for the whole State, but not the fiscal end, which I think is where the problem is.

Mr. **McKernan**. What about your idea of standards for the Youth Programs Act?

I thought what we were talking about were national standards. There are not any that relate to the programs for youth?

Mr. **Fitzsimmons**. What exists now and probably will, when October comes is individual States developing what they consider performance standards. I am talking about the youth competencies, and that will be developed individually.

Thus, there is really no way to develop how Maine looks at youth competencies as its neighbor New Hampshire or Vermont would.

Of course, you take it across the Nation and I don't think you will have the analysis you need to know if youth competencies, if the accomplishments in those areas really mean something on a national level.

Mr. **McKernan**. The national standards that we are talking about are not going to apply to that category?

Mr. **Fitzsimmons**. As of April 26, what you are seeing is a very broad general outline that really is allowing each State to develop their own. How each State measures that could be completely different.

One example is basic education. What Maine considers a level of gain, New Hampshire might not. How do you measure the youth competencies across the Nation, that that one category is the same, and that is a concern I would have.

I think at minimum it should be regionalized to reflect what New England considers a basic education gain during the 9 months, and then maybe after the 9 months, try to get to a national level in all of those areas.

I think in work material, I think business people are expecting the same thing in Maine as they do in California and I think it can be standardized. Education, I think, to the President's remarks about education, I think it is real clear there are some standards that people like to see across the Nation, that this is a bona fide level that we accept.

Mr. McKernan. Literacy, for example.

Mr. Fitzsimmons. That would be one.

Mr. McKernan. You talked about some of the problems of getting the program up and running. Do you foresee problems and are you familiar with New England in terms of having the program on line by October 1?

Mr. Fitzsimmons. Well, from my perspective, I would say yes. Locally we started recruiting for our private industry council back in November, anticipating no later than March we would be designated as an SDA and up and running. We were just designated the end of June.

Our PIC was just formally announced at Monday's meeting of our commissioners, so I think we will be ready. It will not be the way I like to deal with the private industry council.

We will have to rush. We have to get a plan in by August. It will be tight schedules and not the way you want to develop a partnership by pushing hard to get things going. But I think in some of the other States, I don't think they will be up and running.

Mr. Frank can be very pleased. The State of Massachusetts has done a terrific job. He has been a shining example of the transition from CETA to JTPA, and they will be up and running.

I seriously doubt New Hampshire will be up and running.

Mr. McKernan. What do you see as any changes that might take place with the 51 percent business on the PIC's? Certainly that relates to programs you talked about concerning disadvantages.

Do you see any change in the types of people who are going to be served now that we are shifting to a more local area?

Mr. Fitzsimmons. I really don't. I would commend the people who drafted the bill that they put in 51 percent business.

I think obviously we are training people for the private sector. I think it is important to have business on the board and clearly feeling like they have some real say in the direction of this program.

I have found on a local level that there are business people who are extremely involved in the program and have been the movers and shakers to open the doors to get people jobs, and so I do not see any issue.

One concern that I would pass on is, when you are dealing with any brandnew private industry council is their perception of the disadvantaged and the reality of being two separate things.

It takes a lot of work in educating them that the average person coming through our program tests at 7.5 reading level. They are assuming they are ready to take the fancy computer courses when they might not be. It takes a while to get through that.

Once they understand the population we are serving, I think from that point on we have a good working relationship.

Mr. **McKernan**. The potential problem that can result with some of these local areas is that businesses, I assume, are going to want people who read above a 7.5 grade reading level. They are going to want the people who fill their jobs to have a little bit more training and skill.

Would that skew the program at all toward those who really are not the highly disadvantaged but rather those who just need some new skill training in order to fulfill a need at a local labor market?

Mr. **Fitzsimmons**. That is an excellent question. It really is an issue and I think it takes people monitoring the program. It takes people understanding the intent of Congress to make sure that it does not happen that way.

The program seems to be very clear for the most disadvantaged, but what it takes is what I have expressed as my concern earlier, is that you have to put a lot of money into things like remedial education, developing linkages with other schools and adult education programs and dealing with these concerns to raise people to the proper level.

It also means designing courses that are not always the sexiest things, the machine tool level or the electrical maintenance courses. You need to get down to some of the basic cooking, custodial maintenance courses, and some very entry-level, basic-type courses, so that you can reach this whole array of people who are in this level called economically disadvantaged.

There is a whole spectrum. There are people who could be walking in to Congress and function and there are people who need to deal with basic reading skill levels to be able to get jobs.

Mr. **McKernan**. I know of your concern for those disadvantaged and you should be commended for that.

I was wondering whether the PIC's especially may try to focus on not those people but rather others who, with less training, are going to be able to be placed into the local labor market.

I wonder if you would comment on that and also whether or not the standards that have been proposed are going to do anything to offset what could be a disappointing trend in that direction.

Mr. **Fitzsimmons**. Let me add a comment that might address some of the concerns you are raising.

It has been outrageously strange from a local level, after 7 years of working with the regional office, which is, in our case, in Boston. It is very clear that the national office is basically telling the regional offices to stay out of its business. It is between the States and their SDA's.

I understand trying to push in the direction of turning things over to the States, but the concern is we are losing a lot of the expertise, so that people who have been working in the regional office for 7 years dealing in such youth programs and a variety of others.

I think if DOL was to allow the regional offices to get involved in the performance standards and help running the training programs and getting involved in education of the private industry council, that there is another side and it is called the economically disadvantaged going through the program. I think this could address the concern.

It is interesting that it seems to me, and again this is through the rumor mill, that the contracts are going to all these different interest groups to do the training and this one group that has been in business, the regional offices for 7 years running these CETA programs, are completely absent. It seems to be by design.

I respect our regional office. I would like to see them involved in making sure that your concerns are being addressed.

Mr. McKernan. Thank you for coming, John.

Mr. Fitzsimmons. I appreciate it.

Mr. Frank. Mr. Fitzsimmons, in terms of the council, has there been any problem in accommodating various interests that ought to be accommodated in your parliamentary council?

Mr. Fitzsimmons. The council that was just announced is 25 members strong. We had 69 people apply to that council.

It is difficult in areas of community-based organizations. For every nonbusiness you add, you must add an additional business person to stay at the 51 percent. What you end up doing is basically finding one for each one of those categories.

I think you raised a concern earlier about labor's involvement which, as you say, is probably one labor rep on each PIC. It will probably not be more than that.

Just by the nature of it, if you bring on an additional labor person who does not fit one of the criterion of the PIC, you will then have to bring on an additional business person.

Mr. Frank. It has to be 51 percent from business and 4 percent from labor?

Mr. Fitzsimmons. Absolutely, or less.

Mr. Frank. Does that seem appropriate to you? I know you did not write the statute. I did not either.

Mr. McKernan. Well, I did not even vote for it.

Mr. Fitzsimmons. I am not sure. It is a question I would have to think about. You are talking about the education side playing a key role, labor, the rehabilitation agencies, the economic development agencies. I am not sure.

Mr. Frank. Fifty-one percent for business, is that necessary to adequately represent the various business interests or is that to reassure them that soft-headed and political people won't be dominant?

Mr. Fitzsimmons. Is that a leading question?

Mr. Frank. It is just something that was suggested to me. If it had occurred to me earlier, I would have asked Mr. Quinlan.

It seems to me we are stating that 51 percent is not necessary to give representation to various segments of the business community that have to be represented. It is rather a reassurance to them that this will be controlled by level-headed, hard-nosed, and other appropriate anatomical descriptions.

Mr. FITZSIMMONS. I personally don't have an issue at all with the 51 percent, and the reason is that I think the business people help open the doors for the jobs. I do not feel they are experts in employment training, nor are they experts in reviewing curriculum for developing a person for a job.

Mr. FRANK. Well, the PIC then is not really going to be running the program. They are an advisory body to make certain that attention is paid to important subject areas.

Mr. FITZSIMMONS. By law they do have some very clear power. The way it functions in our area is that they prefer to deal with opening the doors for jobs and letting us as administrators run the program.

Mr. FRANK. Your suggestion seemed to me to make sense with regard to the 45 percent youth thing. It seems there is an artificiality when you start saying so much of the time is for that.

Your view is that it is fair to say that 40 percent of those enrolled would be youth. You would then monitor compliance and assure that it would work out.

Have you proposed that to any administrative people?

Mr. FITZSIMMONS. Yes, we have. Initially, of course, we were one of the thousands of letters they were probably receiving around the Nation, but I do see that as a major problem and the rural States are going to be hit very hard by that.

Mr. FRANK. I think that is one of the issues that I would be interested in monitoring after a few months of this, because I can see where that would not only impose a heavy administrative burden, but I think as a general rule you should not ask people to make things up. I think when you do that, you are to a certain extent asking them to make things up.

It would be better to do it, I think, in the more explicit way you are talking about.

I appreciate your testimony and we look forward to being in touch with yourself and others.

On Thursday, we will hear from the National Association of Counties, and Mr. Angrisani from the Labor Department.

I hope that it will not be necessary to have a third set of these hearings, but if necessary, we will be hearing from OMB. If OMB decides to go along with the consensus here, I don't think there will be a need for a hearing. If OMB decides there will not be national standards, then I think the subcommittee will feel compelled to explore that decision with them.

The hearing is adjourned.

[Whereupon, at 12:30 p.m., the subcommittee adjourned, to reconvene on Thursday, July 14, 1983.]

IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

THURSDAY, JULY 14, 1983

House of Representatives,
Manpower and Housing Subcommittee
of the Committee on Government Operations,
Washington, D.C.

The subcommittee met, pursuant to notice, at 10 a.m., in room 2247, Rayburn House Office Building, Hon. Barney Frank (chairman of the subcommittee) presiding.

Present: Representatives Barney Frank, John R. McKernan, Jr., and Dan Burton.

Also present: Larry White, investigator; June Saxton, clerk; and Nancy Elwood, minority professional staff, Committee on Government Operations.

Mr. Frank. The subcommittee will come to order.

The Chair wishes to apologize. I do not like to keep people waiting and there is no excuse for it, particularly since Mr. Angrisani was kind enough to accommodate us under some tough time constraints. Because he does have to leave early, we will call Mr. Angrisani to the witness table now.

Mr. Angrisani, we welcome you.

Our first witness is Mr. Albert Angrisani who is Assistant Secretary of Labor for Employment and Training.

Mr. Angrisani, I apologize. I should not have kept you waiting. You were very gracious in agreeing to testify.

Let us proceed.

STATEMENT OF ALBERT ANGRISANI, ASSISTANT SECRETARY OF LABOR FOR EMPLOYMENT AND TRAINING, ACCOMPANIED BY ROBERTS T. JONES, ADMINISTRATOR, OFFICE OF COMPREHENSIVE EMPLOYMENT AND TRAINING; THOMAS C. KOMAREK, ADMINISTRATOR, OFFICE OF FINANCIAL CONTROL AND MANAGEMENT SYSTEMS; AND PATRICK J. O'KEEFE, ACTING ADMINISTRATOR, OFFICE OF STRATEGIC PLANNING AND POLICY DEVELOPMENT

Mr. Angrisani. Thank you. Mr. Chairman. It is a pleasure to be here today.

I am pleased to have this opportunity to testify before you today on the Job Training Partnership Act [JTPA] and the steps the Department of Labor is taking to insure that JTPA will be an effective and responsibly administered program. As you know, JTPA was enacted into law on October 13, 1982, and becomes fully operational on October 1, 1983.

In my presentation, I will briefly review the key facets of JTPA, discuss our approach to implementing the legislation, and provide you with a report on the current status of implementation. I will then focus on the specific concerns that were raised in your letter of invitation and in discussion with subcommittee staff.

In a number of respects, JTPA represents a significant departure from past employment and training programs, and for several reasons should be considered a landmark piece of legislation. Basic to the act is the premise that training is the vehicle for providing disadvantaged and dislocated workers the skills that they will need to obtain regular, self-supporting employment. To assure that resources are devoted to training, the act places strict limitations on the payment of wages, stipends, and allowances, and administrative expenses.

A second major feature of JTPA is the involvement of the private sector. As past programs have demonstrated, without employer involvement, training and employment services have very limited prospects for success. Under JTPA, employers are involved in every phase of the program's planning, operation, and assessment. This involvement of private sector employers will certainly increase the credibility of the training programs and the acceptance of the trainees by employers, thereby increasing the participants' employment and earnings prospects.

It will also extend to these programs the managerial experience and insights of the private sector. This will improve program performance and increase managerial accountability. For this reason, we believe that JTPA is potentially a model for other private/public partnerships.

A third major feature of JTPA is the increased responsibility that is given to the States when compared with previous training programs. States are the direct recipients of all Federal grants under titles II and III, and are being given responsibilities and oversight authority consistent with the administration's policies on block grants.

Administration's States designate service delivery areas [SDA's] and certify private industry councils. Also, they have review and approval authority over SDA plans. Finally, they have management and oversight responsibilities formerly carried out by the Federal Government, including monitoring of SDA programs, auditing SDA's and other subrecipients, assessing performance and providing performance bonuses, training and technical assistance, and corrective action plans, as appropriate.

A final distinguishing feature of the new training program is its emphasis on performance. JTPA is results oriented, rather than procedures oriented. Under JTPA, performance is judged on putputs. For example, the proportion of participants who enter employment; the wages of participants in the postprogram period; or the extent to which welfare recipients obtain jobs. Rewards and sanctions are linked to performance, with the prospect of bonuses for those SDA's that exceed performance standards; while a reorganization plan will be imposed on those SDA's that fall short of their standards in 2 consecutive years.

At this time, I would like to turn to the Department's implementation of JTPA. Since late last summer, even prior to enactment of JTPA, my senior staff and I have had, as our top priority, the implementation of the program in a timely and responsible manner. We have been committed to laying the foundation of a program that will be effective for years to come; and, I believe, we have achieved our objective.

We have prepared a chronology of our major implementation efforts to date, which I would be pleased to make available to the committee. I would like to mention just a few highlights from the chronology.

Mr. **Frank**. Before you do, let me say that, without objection, we will insert that chronology into the record at this point.

[The material follows:]

- CHRONOLOGY -

Date	Action
September 1982	• Established Transition Task Force to oversee implementation activities.
October 1982	• President Reagan signs JTPA, October 13, 1982.
	• Published Implementation Plan.
November 1982	• Established Assistant Secretary's Advisory Committee on the Implementation of JTPA.
	• Published preliminary draft regulations regarding State Job Training Coordinating Councils (SJTCCs), Service Delivery Areas and Private Industry Councils (PICs).
	• Governors designated JTPA liaisons in 57 States and territories.
December 1982	• Published final rules on SJTCCs, SDAs, and PICs.
January 1983	• Published proposed regulations for Titles I, II, and III.
February 1983	• Initiated needs assessment for technical assistance.
	• Informed Governors about Dislocated Workers Program initial funding of $25 million.
	• Established system for biweekly tracking of implementation progress.
	• Published JTPA transition Training and Technical Assistance Plan.

Date	Action
March 1983	• Published, on schedule, Final Regulations for Titles I, II and III of JTPA. • Established JTPA Question and Answer system. • Announced availability of PIC Planning Grants. • Published Operational Planning Schedule for Implementation. • Issue data to States that they needed to calculate substate allocations.
April 1983	• Notified Governors of additional ($85 million) dislocated worker funds provided through the Emergency Jobs Act. • Report to Congress on the status of implementation. • Issued proposed Fiscal Year 1984 allotments for Titles II and Title III. • Published performance standards for the initial 9-month period. • Released for comment proposed longer-term performance standards package.
May 1983	• Published Technical Assistance guides on a Glossary of JTPA Terms and Definitions and the Participant Record. • Transmitted to States the Quarterly Status Report and Instructions for Completion. • Compiled summary of all Technical Assistance available from DOL and our TA contractors (NAB, NGA, NCSL, etc.)

Date	Action
	• Published FY 1984 final planning estimates for Wagner-Peyser Activities.
June 1983	• Notified Regions and States of additional FY 1983 Technical Assistance Funds totalling $4 million.
	• Disseminated procedures to allow the voluntary transfer of CETA funds to JTPA.
	• Advised Regions and States of the procedures for submitting and processing the Governor/Secretary Agreement and the Governor's Coordination and Special Services Plan (GCSSP).
	• Midterm letter sent to Governors, outlining remaining implementation steps.
	• Midterm letter sent to Congress assessing implementation and transition to date.

Mr. **Angrisani**. Even before JTPA was signed into law, we established a transition task force in the Employment and Training Administration to direct implementation of the anticipated legislation. In October 1982, the month JTPA was signed into law, we published our implementation plan for the act. In November, we established an advisory committee on implementation of JTPA, published preliminary regulations regarding State job training coordinating councils [SJTCC's] service delivery areas [SDA's] and private industry councils [PIC's] and all Governors designated JTPA liaisons. In December 1982, we published final rules on SJTCC's, SDA's, and PIC's, and in January we published proposed regulations for titles I, II, and III of the act. In March, these regulations were published in final form, on schedule. Also in March, we established a question-and-answer system for responding to questions on policies, procedures, and implementation of JTPA, and we issued an operational planning schedule for JTPA implementation. In April, performance standards were published for the initial 9-month period of JTPA operation, and proposed longer term performance standards were published for public review and comment.

The Department is nearing completion of proposals for instructions and systems for which it is primarily responsible. Guidance regarding appeals to the Secretary, submission of State plans and Federal/State grant instruments have been issued. Regulations governing title IV national programs, as well as regulations implementing the amendments to the Wagner-Peyser Act will be published as proposed rules later this month.

Section 181 of the act imposed a very tight schedule on the Department's development and issuance of regulations and other guidance relating to JTPA. It was the view of the act's authors that such a forced march was necessary if the act was to take effect on October 1 of this year. We are proud to report that the Department met—or beat—every deadline imposed by the act.

Our implementation plans go beyond the issuance of Federal regulations. Obviously, the transition from CETA to JTPA is a massive undertaking, involving thousands of staff, billions of dollars, and will affect services to literally millions of people.

We have, therefore, established a system for monitoring the implementation; providing technical assistance where it is requested; and, where problems are identified, providing whatever additional assistance may be needed to assure the smooth and rapid implementation of the new program.

Although I will not dwell on it, concurrent with the implementation of JTPA, we are phasing down and closing out the CETA program. While this is seldom remarked upon, it is a task of considerable complexity and significant importance in assuring that the resources made available to that program are accounted for and disposed of properly.

Considerable effort continues to be made in providing technical assistance and training to those implementing JTPA. The Department has just recently completed training for all appropriate State ES and JTPA staff on the changes to the employment service system. Training on assessment of performance and on financial management have also been provided to all States. Periodic meetings with State liaisons are taking place at which all key issues pertaining to implementation are discussed.

Regional and State level training sessions, the outstationing of staff, and a question hot-line augment our other efforts.

We have developed a guide containing a listing of all the types of technical assistance that are available to the system. A copy of this is being provided to the subcommittee.

Mr. **Frank**. Without objection, that guide will be inserted into the record at this point.

[The material follows:]

JOB TRAINING PARTNERSHIP ACT

SUMMARY OF TECHNICAL ASSISTANCE AVAILABLE TO MEET IMPLEMENTATION NEEDS

EMPLOYMENT AND TRAINING ADMINISTRATION
JUNE 1983

ADDRESSES OF NATIONAL TECHNICAL ASSISTANCE PROVISIONS LISTED IN THIS SUMMARY

	Contact
National Alliance of Business (NAB) 1015 15th Street, N.W. Washington, D.C. 20005 (202) 457-0040	Fred Frederick
National Governor's Association (NGA) 444 North Capitol Street, N.W. Suite 250 Washington, D.C. 20001 (202) 624-5300	Evelyn Gansglass
National Conference of State Legislatures (NCSL) 444 North Capitol Street, N.W. Washington, D.C. 20001 (202) 737-7004	Rod Riffel
National Association of Counties 440 1st Street, N.W. Washington, D.C. 20001 (202) 393-6226	Pat Craig
Human Resource Development Institute AFL-CIO 815 16th Street, N.W. Washington, D.C. 20006 (202) 638-3912	Mike Arnold

Employment and Training Administration (ETA)
601 D Street, N.W.
Washington, D.C. 20216
For MIS: Don Kulick (202) 376-6336 Room 5402
For PMS: Jan Sawyer (202) 376-6254 Room 5010
For Performance Standards: Kay Albright (202) 375-6620 Room 9002
For Other Categories: Harold Dance (202) 376-7240 Room 6403

TECHNICAL ASSISTANCE CATEGORIES

A. GENERAL JTPA TRANSITION ASSISTANCE

B. ORGANIZATION AND STRUCTURE

C. PLANNING ACTIVITIES

D. PROGRAM DESIGN

E. PROGRAM ADMINISTRATION AND MANAGEMENT

F. FISCAL MANAGEMENT SYSTEMS

G. MANAGEMENT INFORMATION SYSTEMS

H. LABOR MARKET INFORMATION

I. PERFORMANCE STANDARDS

J. PROCUREMENT POLICY

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
A. General JTPA Transition Assistance	• Advisory Committ. Meeting A group composed of: business; labor; State Governor's representatives; State legislators; and public interest group members. Provides perspectives on JTPA implementation.	ETA	Council Members and high level ETA officials	2/15/83 4/21/83
	• State Liaison Meetings One or two-day conferences held on an as needed basis for State JTPA liaisons. The purpose of these meetings is to provide the liaisons with current information on JTPA implementation, and to provide a forum for exchange of information and questions.	ETA, with NGA	State liaisons and other State staff Regional ETA staff	2/6/82 2/9/83 4/19 & 20/83
	• Planning Grants for Governors Regional Office/Governor grants providing funds for flexible use in making the transition to JTPA.	ETA	States	9/82
	• Planning Grants for PICs National Office/Governor grants establishing a mechanism for providing grants to certified PICs.	ETA	PICs	3/83
	→ • Fact Sheet Synopsis of JTPA by title.	ETA	General	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	• "Initial Briefing on JTPA" Training Material A long and short version training package with visual aides. Provides an orientation to the Act and regulations.	ETA	States and others	Available
	• BIZNET Closed circuit teleconferences with Chambers of Commerce in 37 cities. Role of business under JTPA is discussed by President, DOL officials and NAB officials.	NAB	Chambers of Commerce (Business)	1/83
	• Question and Answer System A series of FMs providing responses to frequently raised questions on JTPA and the regulations.	ETA	Regions and States	3/14/83 3/18/83 4/6/83 5/11/83
	• Opinion Letters Responses to questions concerning individual State concerns in implementing JTPA.	ETA	States	As Needed
	• Employment and Training Policy Conference General Discussion of JTPA.	NGA	States	12/83
→	• Wagner-Peyser Training JTPA Amendments and their affect on ES operations.	ETA	State staff Regions I-IV Regions V-X	 5/24/83 5/26/83
→	• Wagner-Peyser Train-the-Trainer Funding process for non-labor exchange activities.	ETA	Regional Office Staff	6/1 & 2/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	• Analysis of JTPA -- "Legisline" and "Regsline" NGA's regular publications on legislation and regulations which have included articles on JTPA and the regulations.	NGA	States	
	• Training Materials on Partnership Roles Details roles at Federal, State and SDA level.	ETA (Region VIII)	States, SDAs	Available
	• Legislative Conferences Overview of JTPA.	NAB	PICs Business Community and other employment and training professionals.	11/82
	• "JTPA Pocket Guide" Pamphlet style guide to the Act.	NAB	General	Available
	• Updated Comprehensive Guide to JTPA A "side by side" Act and regulations presentation with a number of technical supplements.	NAB	General	5/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	• Statewide Meetings with RSOs General JTPA information for NAB personnel.	NAB	RSO staff	5/83 - 6/83
	• Technical Report on ES Regulations A summary of ES regulations with emphasis on implications for PICs/Business.	NAB	PICs Business Other	
	• "Job Training: Strategies For Legislatures Conference" Presentations/discussions of State legislative responsibilities and opportunities in implementing JTPA.	NCSL	State legislators and staff	4/83
	• JTPA Annotated Breakdown A summary of the Act stressing the roles and responsibilities of the States, the SJTCC, State Legislature and other State level elements of JTPA.	NGA/NCSL	States	Available
	• Briefing Materials for State Legislators and Staff Specific State legislative roles in JTPA and option considerations for legislative involvement in JTPA.	NCSL	State legislatures and staff	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	• Conference General discussion of JTPA: program models, target populations, partnership coordination.	USCM/NAPIC	NAPIC members City staff	3/1 - 4/83
	• Distributed Computer Network (DCN) VAX System Menu of information regarding JTPA; including occurrence count for terms, text search, FM series, CETA closeout Q&A, JTPA allotments, performance standards, comp. table.	RX-K. Thompson	All Federal & State network users	Availabl
General JTPA Transitional Assistance	NACo CONFERENCES			
	• Western Interstate Region - Phoenix, AZ Representatives from the State Governor's Office, USCM, NAB, and DOL joined with NACo representatives in a workshop which presented the different perspectives on JTPA implementation.	NACo	Elected and appointed officials	4/27/83
	• Annual - Milwaukee, WI Three workshops: (1) Closing the Books on CETA; (2) Implementation of JTPA for practitioners; and (3) JTPA--What's in it for the elected official.	NACo		

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	The first and second workshops will assist the practitioners in understanding the closeout procedures necessary for closing the books on CETA and the actions that must be taken to implement JTPA on time.		Mostly appointed Some electeds	7/17/83
	The third workshop will focus on assisting elected officials in understanding their new role under JTPA.		Mostly electeds Some appointed	7/18/83
	Panelists from DOL, Governor's Office and other public interest groups will join NACo representatives in sponsoring these panel discussions.			
→	· Employment - Memphis, TN More than thirty workshops and minisessions will be featured at this conference. These activities will be designed to brief JTPA practitioners and elected officials on the current issues in JTPA, and to discuss alternative approaches for resolving them.	NACo	Mostly appointed Some electeds	10/23-26/83
→	· Legislative - Washington, DC One or two workshops will be featured to highlight legislative issues relative to JTPA. Congressional representatives are expected to serve on these panels with NACo representatives.	NACo	Mostly electeds	2/25-29/84

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
→	STATE ASSOCIATION MEETINGS NACo staff will conduct briefing sessions at nine State association meetings to assist local elected officials in understanding their new roles and responsibilites under JTPA. Audio visual aids, briefing material and issues papers are being developed for these meetings.	NACo	Elected officials	6/83 - 2/84
	. Ohio			6/19/83
	. Washington			6/21/83
	. New Jersey			6/22/83
	. Pennsylvania			8/7/83
	. South Carolina			8/14/83
	. Florida			9/15/83
	. New York			9/18/83
	. California			11/15/83
	. Kentucky			11/16/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
→	. Acronyms Under the Job Training Partnership Act of 1982 One page listing of acronyms and their translation.	HRDI	General	Available
→	. The JTPA: Provisions Affecting Organized Labor Identification of sections of the Act affecting organized labor.	HRDI	Labor organizations, PICs, SDA staff	Available
→	. Labor Outlook on Jobs and Training Analysis/comments on the major provisions of JTPA.	HRDI	organized labor	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
B. Organization and Structure				
1. State Level				
a. SJTCC Establishment	• "Implementing the Job Training Partnership Act" — An SJTCC Handbook Addresses immediate and long term tasks of concern to the council, including integration of JTPA with other systems.	NGA	SJTCC	4/83
	• SJTCC Orientation Package Fact sheet on SJTCC and role options for SJTCC.	NAB	SJTCC	Availabl
	• "Appointing the State Job Training Coordinating Council An issue paper.	NGA	States	Availabl
	• Issue Paper Business involvement in the JTPA"	NGA	States	Availabl
b. State Organization Options	• "Creating a State Administrative Structure for JTPA" An issue paper on JTPA administrative options.	NGA	States	Availabl
	• Paper "An Organizational Option for State Administration of JTPA" Discussion of issues involved in selecting an organizational structure for the JTPA.	NGA	States	Availabl

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
c. SDA Designation	• JTPA Transition Calendar List of critical steps and suggested dates.	NGA (Washington)	States	Available
	• SDA Designation Process	NGA (Wisconsin)	States	Available
	• "Designating Substate SDAs" An issue paper.	NGA	States	Available
d. PIC Certification	• Letter From ETA to Governors Discusses the local nominating process as a certification consideration.	ETA	States	3/83
2. Local Level				
a. Organizational Options	• "The Whole PIC Catalog -- Organization, Planning and Service Delivery Under JTPA" A handbook on local level agreements, system models, plan development, performance standards, program operations and oversight.	NAB	SDA level organizations	5/83
	• Sample PIC/LEO Agreements	NAB	PICs, LEOs	4/83
	• "Private Industry Council Roles and Options: Making the Job Training Partnership Act Work"	NAB	PICs	Available
	• "Multijurisdictional SDAs" -- A Technical Report Considerations for PICs and local governments in areas where several governmental units are a single SDA.	NAB	SDA level	4/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
b. PIC Establishment	See "2a" above.			
	• Technical Report on PIC Nomination Process	NAB	SDA level organizations	4/83
	• Establishing PICs and PIC/LEO Planning"	NGA (Massachusetts)	SDA level organizations	Availabl
	• Sample PIC Bylaws	NAB	PICs	6/83
	• Orientation Sessions Facilitators guide and support materials, roles and options slide show, other visuals.	NAB	PICs	5/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
C. Planning Activities				
1. State Level				
a. Annual Statement	• "Implementing the JTPA - An SJTCC Handbook" See "B.1.a."	NGA	States	Available
b. Governors Coordination and Special Services Plan	• "Implementing the JTPA -- An SJTCC Handbook" See "B.1.a."	NGA	States	Available
	• Letter from ETA to Governors Outlines plan requirements and submission instructions.	ETA	States	4/83
	• "The Coordination Linchpin: Making Sense of the Coordination Mandates Under JTPA" -- An Issue Paper A discussion of opportunities and ideas concerning coordination of various State and local agencies.	NGA	States	Available
c. Statewide SDA Plan	• Letter from ETA to Governors Outlines plan requirements and submission instructions.	ETA	States	5/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
d. State Guidance to SDAs on Planning	• Letter from ETA to Governors Initial allotments for FY 1984 and planning instructions.	ETA	States	4/83 - 5/83
	• Letter from ETA to SESA Administrators Data for each functional governmental unit within the State on: total population; low income adults; economically disadvantaged, total; and economically disadvantaged 16-21, and 22 and over.	ETA	States	Available
e. State Level Planning	• JTPA Transition Calendar	NGA (Washington)	State	Availabl
	• Implementation Milestones Suggested dates for accomplishing required activity.	NGA	State	Availabl
	• "Implementing the JTPA — An SJTCC Handbook" See "S.1.a."			
	• Samples of State issuances on Planning	NGA	State	5/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
2. Local Level				
a. SDA Plan Development	• "The Whole PIC Catalog" See "B.2.a."			
	• Sample PIC-LEO Agreements	NAB	PICs/LEOs	6/83
	• "Developing the Local Job Training System: Planning, Management and Evaluation (PME)" A 3-volume document incorporating many useful commonly used planning, management and evaluation business practices and applies them to the unique needs of the job training system.	NAB	SDA level organizations	5/83
b. SDA Planning Estimates	• Letter From ETA to Governors See d. above.			
c. Wagner-Peyser Development Linkage	• "Integrating Job Training and Labor Exchange Functions" An issue paper.	NGA	General	4/83
4. PIC Planning	• Technical Report on How PICs Can Use Planning Money Available from ETA	NAB	PICs	4/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
D. Program Design				
1. State Level				
a. Education	• Conferences State program responsibilities.	Region V	States	4/83
	• Educational Reference Citations	NGA (Washington)	States	Availabl
	• Issue Paper on State Education Programs Under JTPA	NGA	State	6/83
b. Older Workers	• Conferences State program responsibilities.	Region V	States	4/83
	• Issue Paper on State Programs for Older Workers Under JTPA	NGA	States	5/83
c. Dislocated Workers	• Bulletins, "Showcase," Model Programs A variety of descriptive materials.	NAB	General	Availabl
	• Conference A several day series of workshops on dislocated worker problems and program options.	NAB	General	4/83
	• Conference Proceedings and Film A summary of the above conference. A 28-minute film of the conference.	NAB	General	7/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	• "Economic Development and Dislocated Workers"	NGA (California)	General	Available
	• Survey of Region X Programs A survey of current efforts in the northwest for dislocated workers.	ETA-Region X	General	Available
	• State Planning TAG	NAB	States	5/83
	• Conference	ETA-Region I (Connecticut)	General	4/83
	• Comprehensive Information Package Model programs, bibliography, etc.	NAB	General	5/83
	• "Strategies for Dealing With Plant Closings" A discussion paper.	NAB	General	Available
	• Implementation of a State Response in Preparation for Industrial Shift A descriptive paper.	NGA (Arizona)	General	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
	→ . Plant Closings: What Can Be Learned From Best Practice Plant closing case studies; identifies elements of successful dislocated worker program.	DOL-LMSA Division of Cooperative Labor-Management Programs #029-011-00007-9 ($4.50 charge)	General	Available
	→ . Action Steps for State AFL-CIO Bodies Discussion paper which identifies the role of organized labor in Title III of JTPA.	HRDI	Organized labor	Available
	→ . Summary of the State of Illinois' Plans for Title III Dislocated Worker Programs	HRDI	General	Available
	→ . Organized Labor's Role in the New Title III Program for Dislocated Workers	HRDI	Organized labor	Available
	→ . Facts About the New Title III Program for Dislocated Workers	HRDI	General	Available
	→ . Labor-Involved Services for Displaced Workers Program models	HRDI	General	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
d. TJTC	. Brochure Promotes TJTC to employers and explains provisions.	NAB	Employers	Available
	. TJTC Fact Sheet Encourages employers to use TJTC in hiring summer youth.	NAB	Employers	Available
	. "Bottom-Line Benefits to Business" - Seminar Half day seminars on employment and training programs, particularly TJTC.	NAB	Small and medium size businesses and CPAs	Available
	. Cost-Free CPA TA Assistance to businesses in using TJTC to derive maximum benefits.	NAB	Employers	Available
e. Economic Development	. EGS/Economic Development Assortment of material aimed at linking employment and training programs with local economic development activity. Includes training package, assessment and strategy plan instruments, and program models.	ETA-Region IX	States-SDA level organizations	Available
f. Cost Limitations	. Chart Simplified description of cost limitation provisions.	ETA	General	Available
g. Veterans' Programs	. **			

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
2. Local Level				
a. General	• 70 Percent Solution Product II Designing and developing training programs to meet employer needs.	NAB	SDA level	7/83
b. OJT	• Program Models/Leads Computer stored information on successful programs. Available as program summaries including information on results, or, as brief program leads.	NAB	General	Available
c. Classroom	• Program Models/Leads	NAB	General	Available
d. Work Experience	• Program Models/Leads	NAB	General	Available
e. Tryout Employment	• Program Models/Leads	NAB	General	Available
f. Summer Youth	• "Summer Jobs for Youth Promotional Materials" A brochure listing pamphlets, buttons, fliers, etc.	NAB	Employers	Available
	• Program Models/Leads	NAB	General	Available
	• Showcase Articles	NAB	General	Available
	• TAG A program guide and "100" ideas for summer youth jobs.	NAB	General	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
g. Youth - Exemplary	• Program Models/Leads	NAB	General	Available
h. Nontraditional Training for Women	• Program Models/Leads	NAB	General	Available
i. Low/No Stipend Training	• Program Models/Leads, Bulletins, "Showcase"	NAB	General	Available
	• 70 Percent Solution Product IV "Training Without Allowances" Seminars and monographs on expanding OJT vestibule training, shortened training time, and improved client support services.	NAB	SDA level	7/83
	• General Information Package A variety of descriptive materials.	NAB	General	6/83
j. Education/Voc Ed Linkages	• Program Models/Leads	NAB	General	Available
	• Educational Reference Citations	NGA(Washington)	General	Available
	• General Information Package on Industry-Education Linkages	NAB	General	6/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
k. Cooperative Welfare Linkages	• Issue Paper	NGA	General	5/83
	• Workshops Four regional conferences.	NGA	States	5/83
l. Economic Development Linkages	• Issue Paper	NGA	General	5/83
	• Workshops	NGA	States	6/83
	• JTPA and Economic Development A brief discussion paper.	NAB	General	Available
	• Seminar Materials	NAB	General	Available
m. ES Linkages	• "Showcase" Articles on successful linkages.	NAB	General	Available
	• "Integrating Job Training and Labor Exchange Functions" An issue paper.	NGA	General	
n. Client Services	→ • Career Exploration Training Use of the guide to occupational exploration.	ETA-Reg. VII	States/SDAs	Available
	→ • Employability Planning Case controls, records, client reviews, services coordination.	ETA-Reg. VII	States/SDAs	Available
	→ • Client Services Supervision Training Role and function, supervising techniques, case management controls.	ETA-Reg. VII	States	Available
	→ • "Monitoring the Client Services System" Review questions and program design.	ETAReg. VII	States/SDAs	8/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
E. Program Administration and Management				
1. State Level				
a. State Staff Capacity Building	→ • Workshop Staff development strategies.	ETA-Reg. VII	States/SDAs	6/83
	→ • Issue Paper "Managing the State System"	NGA	States	Available
b. Subgrant Management	• Technical Brief on Liability and Grant Administration	NGA	States	Available
	• **Communications Systems			
	• **Managing the ETA Network			
c. EEO/Grievance	• Conference Overview and information exchange.	OCR	States	7/83
	• Issue Papers	NGA	States	5/83
	• Technical Assistance Guide Governors' responsibilities on "how to" on systems and recordkeeping.	OCR	General	7/83
d. Assessment/ Evaluation	• PMR, Volume III See "C.2.a."	NAB	Local	5/83
	• The 70 Percent Solution, Product I An evaluation tool.	NAB	Local	4/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
e. Program Coordination	• Issue Paper "Opportunities for Coordinating Systems"	NGA	States	Available
	• Information Exchange Background analysis on opportunities for cooperation under the JTPA.	NGA	States	Available
f. Program Monitoring	**			

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
3. Local Level				
a. Eligibility Determination/ Verification	**			
b. Client Assessment	**			
c. Job Search and Placement	• General Information Package on Job Clubs	NAB	General	6/83
d. Supportive Services	**			
e. Needs-Based Payments	**			
f. Marketing	• "Bottom Line Benefits to Business" Seminars	NAB	PICs SDA level organizations	4/83
	• "Making the Business Connection" Seminars on marketing to private sector.	NAB	PICs, SDA level organizations	

TECHNICAL ASSISTANCE AND TRAINING NEEDS		DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
g. Targeting					
AFDC	.	Training Seminar Administrative procedures needed to meet the requirements for serving AFDC recipients.	Region I	General	July
Youth	.	**			
Other	.	**			
h. Participant Records	.	Technical Assistance Guide Suggested format and information to be collected for JTPA program applicants and participants as a foundation for the local MIS.	ETA	States/SDA level organizations	4/83
i. Staff Capacity Building	.	Seminars for Executive Level Employment and Training Officials	NAB	SDA level organizations	7/83
j. Outreach	.	**			
k. Counseling	.	**			
l. Follow-up Services	.	**			

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
F. Fiscal Management Systems	• Outlines	ETA-Region III	General	Availabl
1. System Components	• Conference Two conferences.	NGA	States and SDA levels	5/83
	• Technical Assistance Guide Provides information on standards, definitions, allocations, reporting, payroll and cost allocation.	NGA	States	5/83
	• Financial Management Issue Paper	NGA	States	5/83
2. Electronic Fund Transfer	• Training Material Information provided on both the national system and an intra-State system.	ETA-Region VI	General	Availabl
3. Cash Management	• **			
4. Liability	• Technical Brief on Liability and Grant Administration	NGA	States	Availabl
	• Technical Report on Liability Technical report which discusses PIC liability in general, audit liability, and liability insurance.	NAB	PICs/LEOs	3/83
5. Audits	• **			
6. Debt Collection	• **			

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
G. Management Information Systems	• Conference TA to States in designing and operating management information systems.	NGA	States	3/83
	→ • Information Exchange Data management considerations within the JTPA prepared by the New York State Department of Social Services.	NGA	States	Availabl
	• Conference Proceedings A summary of the above conferences.	NGA	States	4/83
	• "Issue Paper - Managing Information at the State Level" MIS consideration - General discussion.	NGA	States	3/83
1. Participant Tracking	• Technical Assistance Guide Suggested format and information to be collected for JTPA program applicants and participants.	ETA	General	4/83
2. Reports/ Information	• Issuance Federal reporting requirements.	ETA	States	4/83
3. Definitions	• Technical Assistance Guide A glossary of JTPA terms and definitions.	ETA	States	5/83

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
4. Data Assessment	. Paper Administrative data processing, import and implications for JTPA	ETA-Region VII	State Staff	Available
5. Statistical Methods	. Paper Applications of regression analysis in use of performance standards	ETA-Reg. VII	State Staff	Available
	. Paper Techniques of statistical sampling.	ETA-Reg. VII	State Staff SDAs	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
H. Labor Market Information	• Issue Paper	ETA-Region IX	General	Available
	• Conference	NGA	States	5/83
	• Training	NGA	States	6/83
1. Data Requirements	• Data for Planning Issue Paper	NGA	States	5/83
2. Dislocated Workers	• Issue Paper	NGA	States	5/83
3. Strategic Manpower Planning	→ • Paper Utilization of LMI for JTPA Planners.	ETA-Reg. VII	State Staff SDAs	Available
	→ • Where to Find Labor Market Information A guide for State labor bodies on resources for labor market information.	HRDI	organized labor	Available

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
I. Performance Standards	• Conference	NGA	States	10/83
	• Issuance	ETA	States	
1. Training	• Workshops/Seminars	NGA/DOL	States	5/83 - 6/83
2. Youth Competencies	• Technical Assistance Guide	ETA	States	
	• Issue Paper	NAB	States	
3. Management Tool	• Issue Paper	NGA	States	
4. Title II-A Standards	• Guide Instructions for varying standards, implementing the nationally based methodology, and instructions on reports and recordkeeping.	ETA	States	
5. Dislocated Workers Goal Setting	• Technical Assistance Guide	ETA	States	

TECHNICAL ASSISTANCE AND TRAINING NEEDS	DELIVERY PRODUCT/METHOD	DELIVERY RESPONSIBILITY	AUDIENCE	DELIVERY DATE
J. Procurement Policy				
1. Policy Standards	. **			
2. Property Management	. Issuance	ETA	States	
3. Performance Contracting	. Bulletins	NAB	SDA level	7/83
	. 70 Percent Solution Product III Workshop and workbook.			
	. Training Material When and how to write a performance contract.	ETA-Region IX	General	Available
	→ . Technical Brief General overview of performance contracting systems prepared by the Illinois Job Training Coordinating Council.	NGA	States/SDAs	Available
4. RFP Process	. Booklet Improving PIC RFP process. Presentation material available.	NAB	SDA level	5/83
5. Grant Review	. **			

Mr. **Angrisani**. I have also, Mr. Chairman, our most recent biweekly status report on JTPA implementation.

Mr. **Frank**. Without objection, we will insert that into the record at this point.

[The material follows:]

BIWEEKLY REPORT ON JTPA IMPLEMENTATION

JUNE 30, 1983

This report covers JTPA implementation activities through June 24, 1983, for the 57 States, territories, and the District of Columbia.

- Fifty-six of the 57 reporting jurisdictions have completed the process of establishing and appointing members to the State Job Training Coordinating Council (SJTCC). All of the jurisdictions with established SJTCCs have held meetings.
- Fifty-four jurisdictions have formally designated service delivery areas (SDAs). New jurisdictions completing designation are: Arizona, Maine and Minnesota.
- Seventeen States and territories have completed private industry council (PIC) certification. An additional 16 jurisdictions have certified some but not all PICs in the jurisdictions. The total number of certified PICs has now risen from 143 to 198.
- Thirty-one States and territories have submitted their basic PIC grant agreement to ETA, an increase of two from the last report.
- ETA has now provided funds for planning grants for certified PICs in 14 States and territories. Funds have been provided for 72 certified PICs.
- Four States and territories have actually distributed PIC planning grant funds to their certified PICs.
- Action on PIC/local elected official (LEO) agreements has now begun. Seven States with multiple SDAs report some PIC/LEO agreements reached.
- Fifty-three jurisdictions have designated the State agency that will be responsible for the administration of JTPA.
- Nineteen jurisdictions have now submitted their Governor/Secretary Agreement, and 15 have submitted their Governor's Coordination and Special Services Plan.
- Funding of the Fiscal Year 1983 Title III formula program continues. Fifty jurisdictions have now submitted grant applications for both the initial Title III allotments and the emergency jobs act funds. Eighty-five percent of the available formula funds have now been obligated to the States.

Mr. **Angrisani**. As you can see from the report:

Fifty-six of fifty-seven States and jurisdictions now have State job training coordinating councils;

Fifty-four States and jurisdictions have completed the process of designating service delivery areas, and we expect the remaining jurisdictions to complete the process this month;

Seventeen States and jurisdictions have certified all their private industry councils, and another 16 States have certified some. The total number of certified PIC's is now 198 and planning grant funds have been provided for 72 of these;

A total of 50 States have applied for all of their title III dislocated workers program funds, and of the $82.5 million available for fiscal year 1983 title III programs by formula, $70 million has been obligated. In addition, the Department has received a number of proposals for title III discretionary funds, and we are now in the process of reviewing those proposals.

Our implementation efforts are proceeding such that on October 1 of this year, the JTPA system will be in place and ready to go. We anticipate that the transfer from CETA and JTPA will occur smoothly and that there will be no major problems or program disruptions.

I will now turn to the specific concerns—performance standards, data collection, management information systems, and JTPA program accountability—raised in your letter of invitation.

In discussing these subjects, I believe we first need to recognize the significant changes in roles and responsibilities that JTPA will make in the employment and training system. I have already mentioned that a distinguishing feature of JTPA is the increased responsibility that is placed on the States, consistent with block grant policy. JTPA is structured so that while the funding is Federal, the planning and administration of the program occurs at the State and local level.

In the sorting out of responsibilities, JTPA gives the Federal Government responsibility for broad policy guidance and for assuring that the Federal funds are spent responsibly, and consistent with Federal policy. Federal attention is focused not on micromanagement, but on insuring the fiscal integrity of the program, and on seeing that the system complies with JTPA and other Federal statutes.

Under the act, the States are primarily responsible for establishing program direction, determining how training and employment services should relate to other initiatives, and administering the program within their jurisdictions. Locally, private industry councils and elected officials will decide the occupations of training, the types of services to be provided, who will be served, and who will provide the services. Thus, it is the States and local areas, not the Federal Government, that will determine how the program is to respond to local labor market problems.

This shift in the roles and responsibilities will result in increased State oversight and monitoring of the system and thereby increase the accountability of the program. Under JTPA, the Governors are responsible for designating SDA's, approving plans and for monitoring and auditing the programs operating within their jurisdictions. Both the act and the regulations require the maintenance of records and data in sufficient detail—fiscally and programmatically—to demonstrate compliance with the provisions of the legislation.

Where irregularities are identified, the State is responsible for their correction; or the State assumes the liability for any costs disallowed. Where the Governor determines that there are substantial violations of the act or regulations, he may revoke all or part of the affected plan. It is to be noted that the act sets aside 5 percent of each State's allotment to support auditing, administrative, and other activities of the State. This 5 percent of the funds is over and above the 15 percent of program funds that are available for administration.

With the States centrally involved in assuring program integrity and compliance with the law and regulations, we have expanded considerably their oversight of the local programs. This will undoubtedly increase accountability and responsibility. The Department will remain attentive to and will monitor the States' discharge of the administrative and oversight responsibilities to assure they are taking appropriate action to prevent the abuses which characterized the predecessor CETA program.

With only 57 State entities to monitor, we will be certain, as never before, that they are doing their job; and, in this area, the job of the States is to make sure that the JTPA programs in their jurisdictions conform to the applicable laws and regulations.

With this division of labor, the Department's oversight will focus on those aspects of JTPA necessary to insure: (1) that the program's fiscal integrity is being maintained; (2) that all statutory requirements are being met; and (3) that the States are discharging their oversight responsibilities consistent with the act.

Departmental oversight will focus on the financial and compliance responsibilities that the statute assigns the Secretary and will involve not only the Employment and Training Administration, but also the Office of the Inspector General and the Office of Civil Rights. We will target our efforts, shifting our focus from time to time, so that we can obtain both the depth and breadth of coverage that is necessary to assess a program as complex as JTPA. Where problems are identified, we will inform the appropriate State and local officials so that prompt corrective actions will be taken.

The Employment and Training Administration will focus on four general facets:

First, we will monitor closely cash management systems and cash on hand.

Second, specific areas of financial systems will be reviewed during 1984 to insure that the recipients' systems and processes are adequate to meet the statutory requirements.

Third, specific operational areas will be reviewed to assure that recipients are meeting the requirements of the statute.

Fourth, through reports and special purpose surveys—including those for evaluation purposes—we will collect and analyze data on the performance of programs and the characteristics of their participants.

The Office of the Inspector General and ETA [Employment and Training Administration] will be involved in investigation and resolution of complaints initiated through the OIG hotline and the

ETA incident reporting systems and in review of the Governor's audit resolution reports. Finally, national program grantees—those funded under title IV of the act—also will receive oversight and compliance monitoring from the Department on an ongoing basis.

The Department's approach to its oversight responsibilities will achieve its basic objective: Assuring the proper and responsible use of the resources Congress appropriates for training and employment services.

A second topic I would like to address is our approach to insuring fiscal and program integrity. We are determined that JTPA will be operated with a much greater awareness of the need to guarantee fiscal and program integrity than has been the case in the past.

The efforts of the Department that I have described will certainly increase accountability throughout the JTPA system. When you consider the context in which they will occur, you quickly recognize why we are confident that this program will be administered more responsibly and efficiently than its predecessors.

The States, under JTPA, are responsible for establishing the fiscal controls and related procedures necessary to assure the proper disbursal of and accounting for Federal funds under titles II and III of the act. The States are also responsible for the biennial audit of JTPA programs operating within their jurisdictions.

As established in both the act and the implementing regulations, the liability for funds improperly expended flows with the funds. Because of this and because of the responsibilities of the States to assure the proper utilization of JTPA funds within their jurisdiction, we expect that the States will be vigilant in their monitoring and auditing. This feature of JTPA will certainly expand and increase the oversight of the program.

Your letter of invitation also asked us to address the subject of performance standards. As you know, two sets of performance standards are required by JTPA—interim standards for the initial 9-month period and longer term standards for program year 1985 and beyond.

Since the first 9 months of JTPA were expected to be a period during which the States and SDA's would be addressing new relationships and responsibilities and because it was recognized that there was a need to develop standards that took account of the systemic revisions embodied in JTPA, the act required only an interim set of standards for the initial 9 months of the program.

Accordingly, we have: (1) issued seven performance measures and accompanying standards for adult and youth programs; (2) issued two performance measures for the dislocated workers program; and (3) provided technical assistance and training to the States.

As provided in the statute, States can adjust the Secretary's performance standards based on demographic and economic differences, as well as the types of participants to be served and the types of services to be delivered. The State then monitors the SDA's performance against the standards, and provides technical assistance or incentive awards, as appropriate. For the initial 9-month period, the standards cannot be used to penalize areas that fail to achieve the standards.

For 1985 and beyond, the Department is considering an approach to performance standards that differs from our interim approach in a number of ways. We are providing a copy of a proposal under consideration for the record.

Mr. **Frank.** Without objection, we will insert that proposal in the record.

[See app. 2, p. 332.]

Mr. **Angrisani.** Comments on this approach have been solicited and are being reviewed. While final decisions on the proposed approach to establishing performance are pending, we anticipate no problems in meeting the act's January 1984 deadline for promulgation of standards for the first full program year.

Next, I would like to turn to the subject of data collection. It is important to note that in both the act and implementing regulations, there are several provisions regarding the collection and retention of program data by the States and localities. In sum, these provisions stipulate that the States and their subrecipients must have sufficient data, in adequate detail, to trace and document the proper use of Federal funds, and to establish that the program has operated consistent with the provisions of the act. These data must be accessible to authorized Federal staff and verifiable for monitoring, reporting, audit, and evaluation purposes.

Because these detailed data will be available and readily accessible, we can achieve an efficiency in our data collection that will give us adequate, accurate information, without unduly burdening the States and localities. We plan to collect data through several channels.

First, there are financial and compliance audits, which I mentioned earlier. A second method for obtaining data on JTPA programs is our management information system or MIS, which will attempt to balance two goals. The first goal is to require sufficient data to provide adequate information for the Department to carry out its Federal oversight responsibilities.

The second goal is to minimize the federally mandated reporting workload burden on JTPA recipients and subrecipient. Finally, there is our evaluation strategy which I would like to take several minutes to discuss.

To carry out the requirement of section 454 of JTPA that the Secretary assess the effectiveness of JTPA programs, the Department is developing an impact evaluation to gather and analyze data on JTPA programs. Although the evaluation strategy is not yet fully developed, we have identified many design characteristics. The strategy under consideration would rely on a stratified sample to collect data on characteristics of the programs, the labor markets in which they operate, and the participants they serve.

With regard to enrollees, we would, in addition to demographic data, collect information on their experiences prior to, during, and subsequent to their program participation. These data also would support the development, modification, and validation of performance standards, as well as analyzing the net impact of JTPA programs. The impact evaluation system is being designed to collect the data needed for making reliable and valid program assessments, through rigorously controlled surveys. This would yield data without imposing added burdens on the program operators.

Data obtained from the impact evaluation will provide information on the extent to which participants benefit from JTPA programs, the level of benefits compared with program costs, which types of participants who benefit most and least from the program, and how the impact varies by type of activity. Overall net impact findings will be useful to policymakers in judging whether the programs have helped the participants as intended.

In addition to the impact evaluation, the Department is also undertaking a major JTPA process review. This effort will document the transition to and implementation of JTPA, identifying the progress and problems in establishing and operating programs under the act.

In conclusion, Mr. Chairman, I would like to thank you for convening this hearing. Like you, we recognize that, if training and employment services are to achieve their objectives, they must be administered responsibly. Secretary Donovan and I are committed to assuring that JTPA will retain the public trust and, thereby, remain available as the vehicle through which disadvantaged and dislocated workers can obtain the economic independence that only a job can provide.

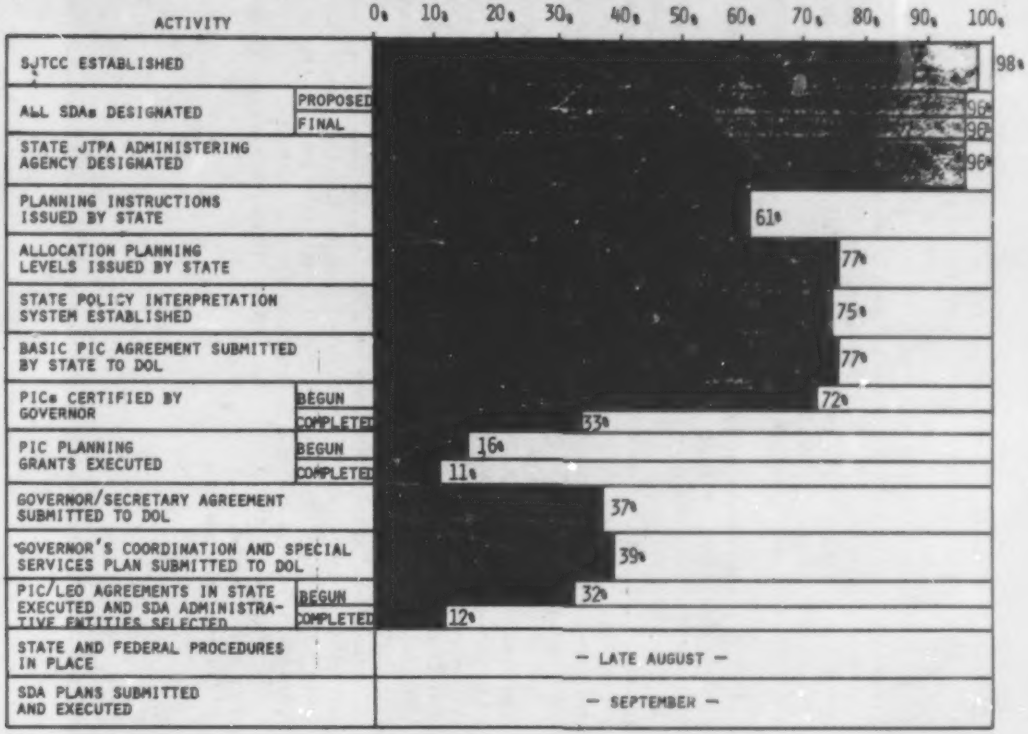
Mr. Chairman, I have with me today three of my most trusted and valuable staff: Mr. Tom Komarek, Administrator, Office of Financial Control and Management Systems, on my right; Mr. Roberts Jones, Administrator, Office of Comprehensive Employment and Training; and Mr. Pat O'Keefe, Administrator of our policy operations and co-chairman and chairman of the JTPA transition task force.

I would like to take 60 more seconds to have you take a look at the chart before you. We put this together for the committee. It gives you a fairly good visual picture of where we are in the implementation process of the Job Training Partnership Act.

Mr. **Frank**. Without objection, we will insert into the record a copy of that chart at this point.

[The material follows:]

JTPA IMPLEMENTATION STATUS SUMMARY REPORT - JULY 15, 1983



Mr. **Angrisani**. In an overly simplistic way, as the white space on the chart diminishes, we get closer to our goal. Breaking that down into a bit more complex explanation, I can point to three essential tasks that are going on right now that characterize the transition process.

The red lines indicate the four primary responsibilities that the Department of Labor had to address to lay the foundation for the new program. They involve the establishment of the SJTCC's—the councils out in the States. The red lines indicate the work that has been done to date on formulation of the SJTCC's, the service delivery areas, the administrative agencies being formed. As you can see, those essential elements are virtually completed.

Below that, we have the column on our planning instructions issued by the States. That is about 60 percent completed, which means that about 60 percent of the planning work is close to being done according to our estimates right now.

The next group of activities that are running parallel to the first two that I have talked about—allocation planning levels, State policy interpretation systems, the basic PIC agreement submitted by the State to the Department of Labor, and PIC certifications by the Governors, both from the standpoint of certifications and completions—fall below that.

Right now, we feel confident that the planning work is moving rapidly and will be completed on time.

The next blue area which cuts into the PIC certification process is the last hurdle, as we see it, in our process. In those areas, we are approaching about 40 percent completion, which means that we have between now and the end of September—an ample 2½ months—to complete that process.

So, without getting into hours and hours of discussion on the status of the implementation, Mr. Chairman, I have read the testimony that preceeded me—and we feel it is corroborated by prior witnesses—so we feel that the transition is well in hand and well underway. As we said when we took on this mission after the legislation was passed—we were going to bring this transition in on line and on time.

Thank you, Mr. Chairman. I appreciate your courtesy in listening to me this long.

[The prepared statement of Mr. Angrisani follows:]

TESTIMONY OF
ALBERT ANGRISANI
ASSISTANT SECRETARY OF LABOR FOR EMPLOYMENT AND TRAINING
BEFORE THE
SUBCOMMITTEE ON MANPOWER AND HOUSING
COMMITTEE ON GOVERNMENT OPERATIONS
U.S. HOUSE OF REPRESENTATIVES

July 14, 1983

Mr. Chairman and Members of the Subcommittee:

I am pleased to have this opportunity to testify before you today on the Job Training Partnership Act (JTPA), and the steps the Department of Labor is taking to ensure that JTPA will be an effective and responsibly administered program. As you know, JTPA was enacted into law on October 13, 1982, and becomes fully operational on October 1, 1983.

In my presentation, I will briefly review the key facets of JTPA, discuss our approach to implementing the legislation, and provide you with a report on the current status of implementation. I will then focus on the specific concerns that were raised in your letter of invitation and in discussions with Subcommittee staff.

In a number of respects, JTPA represents a significant departure from past employment and training programs, and for several reasons should be considered a landmark piece of legislation. The first distinguishing feature of JTPA is its focus on training. Basic to the Act is the premise that training is the vehicle for providing disadvantaged and dislocated workers the skills that they will need to obtain regular, self-supporting employment. To assure that resources are devoted to training, the Act places strict limitations on the payment of wages, stipends and allowances, and administrative expenses.

A second major feature of JTPA is the involvement of the private sector. As past programs have demonstrated, without employer involvement, training and employment services have very limited prospects for success. Under JTPA, employers are involved in every phase of the program's planning, operation and assessment. This involvement of private sector employers will certainly increase the credibility of the training programs and the acceptance of the trainees by employers, thereby increasing the participants' employment and earnings prospects. It will also extend to these programs the managerial experience and insights of the private sector. This will improve program performance and increase managerial accountability. For this reason, we believe that JTPA is potentially a model for other private/public partnerships.

A third major feature of JTPA is the increased responsibility that is given to the States when compared with previous training programs. States are the direct recipients of all Federal grants under Titles II and III, and are being given responsibilities and oversight authority consistent with the policies on block grants. Administration's States designate service delivery areas (SDAs) and certify Private Industry Councils. Also, they have review and approval authority over SDA plans. Finally, they have management and oversight responsibilities formerly carried out by the Federal Government, including monitoring of SDA programs, auditing SDAs and other subrecipients, assessing performance and providing performance bonuses, training and technical assistance and corrective action plans, as appropriate.

A final distinguishing feature of the new training program is its emphasis on performance. JTPA is results oriented, rather than procedures oriented. Under JTPA, performance is judged on outputs, for example: the proportion of participants who enter employment; the wages of participants in the post-program period; or the extent to which welfare recipients obtain jobs. Rewards and sanctions are linked to performance, with the prospect of bonuses for those SDAs that exceed performance standards; while a reorganization plan will be imposed on those SDAs that fall short of their standards in two consecutive years.

Implementation of the Job Training Partnership Act

At this time, I would like to turn to the Department's implementation of JTPA. Since late last summer, even prior to enactment of JTPA, my senior staff and I have had, as our top priority, the implementation of the program in a timely and responsible manner. We have been committed to laying the foundation of a program that will be effective for years to come; and, I believe, we have achieved our objective.

We have prepared a chronology of our major implementation efforts to date, which I would be pleased to make available to the Committee. I would like to mention just a few highlights from the chronology.

Even before JTPA was signed into law, we established a transition task force in the Employment and Training Administration to direct implementation of the anticipated legislation. In October 1982, the month JTPA was signed into law, we published our implementation plan for the Act. In November, we established an advisory committee on implementation of JTPA, published preliminary regulations regarding State Job Training Coordinating Councils (SJTCCs), Service Delivery Areas (SDAs) and Private Industry Councils (PICs), and all Governors designated JTPA liaisons. In December 1982, we published final rules on SJTCCs, SDAs and PICs, and in January we published proposed regulations for Titles I, II, and III of the Act. In March, these regulations were published in final form, on schedule. Also in March, we established a Question and Answer system for responding to questions on policies, procedures and implementation of JTPA and we issued an operational planning schedule for JTPA implementation. In April, performance standards were published for the initial 9 month period of JTPA operation, and proposed longer term performance standards were published for public review and comment.

The Department is nearing completion of proposals for instructions and systems for which it is primarily responsible. Guidance regarding appeals to the Secretary, submission of State plans and Federal/State Grant instruments have been issued. Regulations governing Title IV national programs, as well as regulations implementing the amendments to the Wagner-Peyser Act will be published as proposed rules later this month.

Section 181 of the Act imposed a very tight schedule on the Department's development and issuance of regulations and other guidance relating to JTPA. It was the view of the Act's authors that such a "forced march" was necessary if the Act was to take effect on October 1 of this year. We are proud to report that the Department met--or beat--every deadline imposed by the Act.

Our implementation plans go beyond the issuance of Federal regulations. Obviously, the transition from CETA to JTPA is a massive undertaking, involving thousands of staff, billions of dollars and will affect services to literally millions of people. We have, therefore, established a system for monitoring the implementation; providing technical assistance where it is requested; and, where problems are identified, providing whatever additional assistance may be needed to assure the smooth and rapid implementation of the new program. Although I will not dwell on it, concurrent with the implementation of JTPA, we are phasing-down and closing-out the CETA program. While this is seldom remarked upon, it is a task of considerable complexity and significant importance in assuring that the resources made available to that program are accounted for and disposed of properly.

Considerable effort continues to be made in providing techical assistance and training to those implementing JTPA. The Department has just recently completed training for all appropriate State ES and JTPA staff on the changes to the Employment Service system. Training on assessment of performance and on financial management have also been provided to all States. Periodic meetings with State liaisons are taking place at which all key issues pertaining to implementation are discussed. Regional and State level training sessions, the out-stationing of staff and a question "hot-line" augment our other efforts. We have developed a guide containing a listing of all the types of technical assistance that are available to the system; a copy of this is being provided to the Committee.

Implementation Status

Attached to my statement is our most recent biweekly status report on JTPA implementation. As you can see from the report:

- 56 of 57 States and jurisdictions now have State Job Training Coordinating Councils.
- 54 States and jurisdictions have completed the process of designating Service Delivery Areas, and we expect the remaining jurisdictions to complete the process this month.
- 17 States and jurisdictions have certified all their Private Industry Councils, and another 16 States have certified some. The total number of certified PICs is now 198 and planning grant funds have been provided for 72 of these.
- A total of 50 States have applied for all of their Title III dislocated workers program funds, and of the $82.5 million available for FY 1983 Title III programs by formula, $70 million has been obligated. In addition, the Department has received a number of proposals for Title III discretionary

funds, and we are now in the process of reviewing those proposals.

Our implementation efforts are proceeding such that on October 1 of this year, the JTPA system will be in place and ready to go. We anticipate that the transfer from CETA and JTPA will occur smoothly and that there will be no major problems or program disruptions.

General Oversight and Monitoring

I will now turn to the specific concerns--performance standards, data collection, management information systems, and JTPA program accountability--raised in your letter of invitation.

In discussing these subjects, I believe we first need to recognize the significant changes in roles and responsibilities that JTPA will make in the employment and training system. I have already mentioned that a distinguishing feature of JTPA is the increased responsibility that is placed on the States, consistent with block grant policy. JTPA is structured so that while the funding is Federal, the planning and administration of the program occurs at the State and local level.

In the sorting out of responsibilities, JTPA gives the Federal Government responsibility for broad policy guidance and for assuring that the Federal funds are spent responsibly, and consistent with Federal policy. Federal attention is focused not on "micro-management," but on ensuring the fiscal integrity of the program, and on seeing that the system complies with JTPA and other Federal statutes.

Under the Act, the States are primarily responsible for establishing program direction, determining how training and employment services should relate to other initiatives, and administering the program within their jurisdictions. Locally, Private Industry Councils and elected officials will decide the occupations of training, the types of services to be provided, who will be served, and who will provide the services. Thus, it is the States and local areas, not the Federal Government, that will determine how the program is to respond to local labor market problems.

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With this division of labor, the Department's oversight will focus on those aspects of JTPA necessary to ensure (1) that the program's fiscal integrity is being maintained; (2) that all statutory requirements are being met; and (3) that the States are discharging their oversight responsibilities consistent with the Act.

Departmental oversight will focus on the financial and compliance responsibilities that the statute assigns the Secretary and will involve not only the Employment and Training Administration, but also the Office of the Inspector General and the Office of Civil Rights. We will target our efforts, shifting our focus from time to time, so that we can obtain both the depth and breadth of coverage that is necessary to assess a program as complex as JTPA. Where problems are identified, we will inform the appropriate State and local officials so that prompt corrective actions will be taken.

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- First, we will monitor closely cash management systems and cash on hand.
- Second, specific areas of financial systems will be reviewed during 1984 to ensure that the recipients' systems and processes are adequate to meet the statutory requirements.

- Third, specific operational areas will be reviewed to assure that recipients are meeting the requirements of the statute.
- Fourth, through reports and special purpose surveys (including those for evaluation purposes), we will collect and analyze data on the performance of programs and the characteristics of their participants.

The Office of the Inspector General and ETA will be involved in investigation and resolution of complaints initiated through the OIG Hotline and the ETA Incident Reporting systems and in review of the Governor's audit resolution reports. Finally, national program grantees (i.e., those funded under Title IV of the Act) also will receive oversight and compliance monitoring from the Department on an ongoing basis.

The Department's approach to its oversight responsibilities will achieve its basic objective: assuring the proper and responsible use of the resources Congress appropriates for training and employment services.

Fiscal and Program Integrity

A second topic I would like to address is our approach to ensuring fiscal and program integrity. We are determined that JTPA will be operated with a much greater awareness of the need to guarantee fiscal and program integrity than has been the case in the past.

The efforts of the Department that I have described will certainly increase accountability throughout the JTPA system. When you consider the context in which they will occur, you quickly recognize why we are confident that this program will be administered more responsibly and efficiently than its predecessors.

The States, under JTPA, are responsible for establishing the fiscal controls and related procedures necessary to assure the proper disbursal of and accounting for Federal funds under Titles II and III of the Act. The States are also responsible for the biennial audit of JTPA programs operating within their jurisdictions.

As established in both the Act and the implementing regulations, the liability for funds improperly expended flows with the funds. Because of this and because of the responsibilities of the States to assure the proper utilization of JTPA funds within their jurisdiction, we expect that the States will be vigilant in their monitoring and auditing. This feature of JTPA will certainly expand and increase the oversight of the program.

Performance Standards

Your letter of invitation also asked us to address the subject of performance standards. As you know, two sets of performance standards are required by JTPA--interim standards for the initial 9-month period and longer term standards for program year 1985 and beyond.

Since the first 9 months of JTPA were expected to be a period during which the States and SDAs would be addressing new relationships and responsibilities, and because it was recognized that there was a need to develop standards that took account of the systemic revisions embodied in JTPA, the Act required only an interim set of standards for the initial 9 months of the program. Accordingly, we have:

- issued seven performance measures and accompanying standards for adult and youth programs;
- issued two performance measures for the dislocated workers program; and
- provided technical assistance and training to the States.

As provided in the statute, States can adjust the Secretary's performance standards based on demographic and economic differences, as well as the types of particpants to be served and the types of services to be delivered. The State then monitors the SDA's performance against the standards, determines whether the SDAs have met their standards, and provides technical assistance or incentive awards, as appropriate. For the initial 9-month period, the standards cannot be used to penalize areas that fail to achieve the standards.

For 1985 and beyond, the Department is considering an approach to performance standards that differs from our interim approach in a number of ways. We are providing a copy of a proposal under consideration for the record. Comments on this approach have been solicited and are being reviewed. While final decisions on the proposed approach to establishing performance standards are pending, we anticipate no problems in meeting the Act's January 1984 deadline for promulgation of standards for the first full program year.

Data Collection/MIS

Next, I would like to turn to the subject of data collection. It is important to note that in both the Act and implementing regulations, there are several provisions regarding the collection and retention of program data by the States and localties. In sum, these provisions stipulate that the States and their subrecipients must have sufficient data, in adequate detail, to trace and document the proper use of Federal funds, and to establish that the program has operated consistent with the provisions of the Act. These data must be accessible to authorized Federal staff and verifiable for monitoring, reporting, audit and evaluation purposes.

Because these detailed data will be available and readily accessible, we can achieve an efficiency in our data collection that will give us adequate, accurate information, without unduly burdening the States and localities. We plan to collect data through several channels. First, there are financial and compliance audits, which I mentioned earlier. A second method for obtaining data on JTPA programs is our management information system (or MIS), which will attempt to balance two goals. The first goal is to require sufficient data to provide adequate information for the Department to carry out its Federal oversight responsibilities. The second goal is to minimize the Federally mandated reporting workload burden on JTPA recipients and subrecipients. Finally, there is our evaluation strategy which I would like to take several minutes to discuss.

To carry out the requirement of Section 454 of JTPA that the Secretary assess the effectiveness of JTPA programs, the Department is developing an impact evaluation to gather and analyze data on JTPA programs. Although the evaluation strategy is not yet fully developed, we have identified many design characteristics. The strategy under consideration would rely on a stratified sample to collect data on characteristics of the programs, the labor markets in which they operate, and the participants they serve. With regard to enrollees, we would, in addition to demographic data, collect information on their experiences prior to, during and subsequent to their program participation. These data also would support the development, modification and validation of performance standards, as well as analyzing the net impact of JTPA programs. The impact evaluation system is being designed to collect the data needed for making reliable and valid program assessments, through rigorously controlled surveys. This would yield data without imposing added burdens on the program operators.

Data obtained from the impact evaluation will provide information on the extent to which participants benefit from JTPA programs, the level of benefits compared with progam costs, which types of participants who benefit most and least from the program and how the impact varies by type of activity. Overall net impact findings will be useful to policymakers in judging whether the programs have helped the participants as intended.

In addition to the impact evaluation, the Department is also undertaking a major JTPA process review. This effort will document the transition to and implementation of JTPA, identifying the progress and problems in establishing and operating programs under the Act.

Conclusion

Mr. Chairman, I would like to thank you for convening this hearing. Like you, we recognize that, if training and

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employment services are to achieve their objectives, they must be administered responsibly. Secretary Donovan and I are committed to assuring that JTPA will retain the public trust and, thereby, remain available as the vehicle through which disadvantaged and dislocated workers can obtain the economic independence that only a job can provide.

Mr. Chairman, this concludes my prepared statement. At this time, I would be pleased to answer any questions that you or other Subcommittee Members may have.

Mr. **Frank**. Thank you.

We will begin the questions with Mr. McKernan.

Mr. **McKernan**. Thank you, Mr. Chairman.

I appreciate the testimony that you have given us. I would like to know whether or not your staff had developed any kind of a chart before this process all began as to where you would like to be at various points during the transition period.

Mr. **Angrisani**. Yes; we have. That is a good question. It hits at the heart of the spirit of the management process that we laid out when we took this mission. Getting the legislation was a difficult battle, but after the legislation was completed, we didn't break one day. We met as a team, my staff and myself—and I would like to say, by the way, that I think they are the best in the business, the best in this Government—and we laid out what we thought we had to do from the standpoint of bringing a piece of legislation, a theory on-line as a program We laid our charts out that day, along the lines of a PERT network system which is used in management to deal with transition of systems or various operations.

From that very point we have not only had an outline and a game plan, but we have, in fact, been tracking State-by-State their progress against that plan. That information is available to the committee if it so desires it.

Mr. **McKernan**. I would just like to ask you whether you have any concern about some of these figures at the bottom of the chart, the 37 percents and the 32 percents and the 12 percents on the agreements, for instance, that have been completed and whether that is going to have any effect on the transition.

Mr. **Angrisani**. The answer to that is no. I would like to point to some of the facts as to why we are not concerned about that. As a matter of fact, we think they are very much on schedule.

First of all, the number of appeals that we are getting into the Department is very, very few, which is an indication that the States are taking the time, in the States and at the local level, to resolve their differences. This means that quality is emerging versus quantity. That number could easily be higher, but if the number of appeals that we were getting in were of a significant volume, then I would be concerned because those appeals take the time.

So, what we are really looking at, I think, is a quality process where the Governors and the local officials and the business community are sitting down and talking and working out their problems and making decisions that hold.

We are 40 percent along the way. Every one of those PIC's is going to be certified, and we think they are going to be done with quality.

If you look at the testimony that we had when we were forming the legislation, that was one of the things we were concerned about. We needed quality down there, as well as a good intent. We think we are getting that quality.

Mr. **McKernan**. We heard some testimony on Tuesday that some groups in New Hampshire are appealing in the Federal courts the designation of SDA's. Is that what they are appealing, by the way?

Mr. **Angrisani**. I think so, yes.

Mr. **McKernan**. How is that going to affect their implementation of this legislation?

Mr. ANGRISANI. Well, we have made our decision, and I suspect if a particular appeal goes to the courts, then we have to allow it to go to the courts, and if they make their decision 1 year or 2 years from now and if it supports the decision we have made, then nothing is changed. If it doesn't, then some adjustments may be called for.

But from the standpoint of operations and running the program, the decision holds and the program goes as it is.

Mr. MCKERNAN. I was going to ask you whether or not in New Hampshire the decisions that have been made and upheld by DOL are going to result in a program going on line in October based on the decisions made by the State and by DOL so that there will be a program in that State. Then any changes that are required by court order would take place at a later date; is that right?

Mr. ANGRISANI. Yes; it could very well work that way.

Of course, we live within those boundaries in every thing we do. Just recently, we had a favorable opinion passed down by the courts on our Davis-Bacon changes, which, as you know, were taken up in the courts. The decision, that is, the system has to operate and adjust if the courts force us to adjust. We are perfectly prepared to do that, and the system is flexible enough to do that.

Fortunately, my recollection is that we have one and potentially two cases that might go to the courts. That is not bad considering the fact that we are dealing with potentially 600 SDA's.

Mr. MCKERNAN. I guess what I am getting at, though, is that in a State like New Hampshire the process is ongoing, and the program will go into effect; is that what you are telling us? That is based on the decisions that have been made by DOL. And, any changes that the courts require will be taken up at a later date, but the program will go into effect on October first?

Mr. ANGRISANI. Yes, sir; Bob (Jones), if I am incorrect, please say so.

Mr. JONES. The system is established so that as the Secretary's decision has been made, the program will move ahead with planning, people will be served, and the money will flow.

The only shift that would occur is as a result of current action who the specific operator might be. I suspect that that won't change the program plan very much.

Mr. MCKERNAN. Are there any circumstances that you can envision in which a State would not have a program on line by October first?

Mr. ANGRISANI. We don't have any plans for that. We are thinking very positively right now. As for your initial question about whether or not we laid these things out early on, we have set up a 2-week monitoring system, a fail-safe system where if any State gets into trouble we will know it, and we are perfectly capable of providing the resources and staffing needed to bring them up to date. So we don't believe anyone is going to be in trouble, and we won't let anybody get into trouble.

Mr. MCKERNAN. You say on page 14 of the testimony that you prefiled with us: "No penalties will be imposed for failure to meet the Department's standards during the transition period." Is there going to be a way that the Department is going to know how successful or unsuccessful the States are going to be in that initial 9 months?

Mr. ANGRISANI. Yes. I think we will be able to come back here as often as you want us to come back and give you some assessments. I would say that it will be difficult to get placement-into-job ratios because most of these programs will run probably 9 months to a year, anyhow.

But we will be able to give you information with regard to how efficiently they are spending their money, how efficiently the programs come up to speed. We feel capable, basically, of being able to give you just about whatever information you want, other than placements in that short period.

Beyond that, of course, you will get placement information.

Mr. MCKERNAN. Needless to say, I have not read through all the standards that were promulgated in April, but if we are accepting the benefits of having the standards from the Federal level with the implementation actually taking place at the local level so that we have more local control—and that is something that I happen to agree with—is there any process by which you will be able to evaluate not only the standards met by the various localities but also the strategies that they use in their program so that we would be able to get some kind of a comparison on how these results were achieved, as well as the actual results?

Mr. ANGRISANI. Let me ask our author to give you that so that you get it right from the person who is responsible. Pat (O'Keefe), why don't you talk about that?

Mr. MCKERNAN. I was getting a little nervous when all three of your people looked to see who the author was. [Laughter.]

Mr. O'KEEFE. The question that you raise, Congressman, goes to the evaluation of differential impacts based on different kinds of services, target groups, and the types of designs of the programs.

We will have in place a study which will give us detailed information on a selected sample of sites around the country that will permit us to answer that question. The data from this longitudinal survey will feed back into our establishment of performance standards in a way that will permit us to update continually those standards so that they reflect what actually is going in JTPA.

Mr. MCKERNAN. There is going to be testimony later today about some of the problems about the definition of family and family income. I think this raises an issue that I would like for you to address. How are changes that may occur in various State programs, based on different definitions that are used and on different ways of implementing the program, going to affect the national program, and how are we at the Federal level going to be monitoring those kinds of changes that could really affect who is served and who isn't by this program?

Mr. ANGRISANI. I will ask Bob Jones to elaborate on this. The reporting base that we have will give us a fairly good indication of who is being served, which we will be able to break down.

Bob, you might want to comment because of your past experience in the CETA program.

Mr. JONES. I think it is important to appreciate the fact that we are operating under a set of standard definitions that are prescribed by the law and that the people in this program are required to be economically disadvantaged, by definition.

The issue over family income is basically a technical definition that lies within the substrata of the overall definitions of economic disagreement. While there technically might be some variation from State to State, it is only going to occur on the margins, either in terms of size of family or in income levels, that are prescribed by other welfare programs within the State.

I suspect on a national basis that that variance is not going to be of significant nature. It will average out at best.

The truth of the matter is that if you went back and checked it, if you had any way of doing it against the old CETA program, you probably wouldn't find much difference. I don't really think it will have that much impact.

It will certainly be much easier for the States and localities to operate with the definitions that they are using with other programs than it would be to put in arbitrary and capricious Federal ones that they have to test against.

A significant number of problems in the CETA program through the years were against the definition. They had no local standard.

Mr. **McKernan**. Finally, we heard a lot of comments at our hearing on Tuesday about the Office of Management and Budget's lack of willingness to correspond with various people who have asked them about the standards that were promulgated. It seemed to me that really everyone was in the dark as to exactly why OMB has not acted and whether they are going to and if there are going to be any changes. That lack of knowing exactly how OMB is going to respond has held up some of the data organization for the various programs.

Would you like to comment, first of all, on whether you have had any conversations with OMB and, second, whether you see any problems developing by OMB taking, by some people's criteria, longer than they should?

Mr. **Angrisani**. I think there is an explanation of the process that everyone needs to understand. We have been living in this transition process now since October. I have to say this, in fairness, because it is the truth. I don't know of any program—and I have asked my staff to try to find one—where the type of regulatory production burden that we have been under had been thrust upon anybody in the Government in a long time. We have had, in a period of 5 to 6 short months—because we were coming off the legislative development process—to put through an entirely new regulatory process for training programs that govern our country. I could not have gotten through without the cooperation of OMB. They stayed there with us until 8 and 9 o'clock at night, and they bent over backward to accommodate our schedules.

So, let me say this in fairness—we are where we are because they have cooperated with us.

In the area of performance standards, there is a discussion going on now between us. I think the only way to characterize it is to say that they support the concept of performance standards, just as we do. They support the legislation. But I think the clause that lawyers like to invoke from time to time is appropriate—"reasonable men will differ" on point-by-point applications of certain things.

Where we are right now is in the process of sorting out those differences.

I have no doubt that we will come to resolution within the timetables. How they are going to come out, I can't predict. I hope they come out for the best. Our track record seems to be that they have come out for the best in the past.

Mr. **McKernan**. I am sure the chairman will want to follow up on that. I will yield to him at this time.

Mr. **Frank**. Thank you.

One of the questions that came up last time—and we discussed it on Tuesday—was the question of in school youths. I must also say that everyone who testified was impressed with the way in which the Department of Labor and your office has dealt with this.

As for OMB, not so good; but you are in good shape.

The question is with regard to young people and whether or not programs are going to get any credit under the system for helping kids stay in school, particularly the 15- and 16-year-olds. There was some concern that the way the performance standards are now don't provide such credit. If you work with a kid and he doesn't get a full-time job or a reasonable job but stays in school, that that is not going to count at all.

Is than accurate?

Mr. **Angrisani**. Let me ask Mr. O'Keefe to respond to that.

Mr. **O'Keefe**. Mr. Chairman, there are youth measures that have been promulgated in our April issuance, and there is provision in the statute also for locally derived youth competency measures, so I think that the way that it is being phrased is not accurate.

For example, if you had a youth enrolled in the program who, subsequent to having participated, left the program and went back to school, then that would count as an "other termination."

Mr. **Frank**. For a 16-year-old or a 17-year-old?

Mr. **O'Keefe**. I can't think of any reason why there would be a distinction.

Mr. **Frank**. So, the Department of Labor's position is that this is a reasonable outcome, and it is a success if a young person is kept in school or goes back to school who might otherwise have left?

Mr. **O'Keefe**. Yes, sir.

Mr. **Frank**. There appears to be some confusion on that. I would urge you to talk to the people involved because several of the people who testified on Tuesday were not sure about that. They seemed to think there was some distinction between 14- and 15-year-olds and those who are older.

I think that would be useful.

Another specific question that some people had concerned the 6-percent incentive awards and whether any guidelines exist now. How is that going to be handled? People see that potential extra money and they want to know how they can earn it. How can they earn it? When are they going to know that?

Mr. **Angrisani**. Do you have any ideas on that, fellows?

Mr. **Jones**. As the law points out, Mr. Chairman, there are both rewards for those people who succeed under the performance standards and technical assistance for those who do not. The money, in fact, will have to be accounted for by the Governor under one of those two categories. There is not any middle category.

Mr. **Frank**. Will it be State by State or national?

Mr. **Jones**. State by State.

Mr. **Frank**. The States will basically be the ones who decide who gets the 6 percent; is that right?

Mr. **Jones**. The whole performance-standard system is not applied at the Federal level; it is applied from the State down to the local area. Those moneys must be accounted for and delivered to each of the local areas, either as performance rewards or as technical assistance. So, they will see it directly and specifically.

Mr. **Frank**. Let me ask you about technical assistance. Is there any role for the Governors in that? There is some concern that the National Alliance of Business will have substantial control over the technical assistance money and that the Governors will not have any input. Some of the locals are also a little worried about that.

Mr. **Jones**. I think to the contrary. The way this law is structured, under the 6 percent, for the first time the Governors will have a pot of funds——

Mr. **Frank**. I am talking about the technical assistance.

Mr. **Jones**. Yes, sir. The 6-percent money is, in fact, either technical assistance or reward money. It is the first time that the Governors will have the responsibility for administering the program, to have funds and a program of technical assistance to local areas——

Mr. **Frank**. What about other technical assistance money? Will it all be going to go through the National Alliance of Business?

Mr. **Jones**. No, sir, it certainly is not. It goes through a broad range of organizations from the National Association of Counties and Conference of Mayors and a long list that we would be happy to provide—

Mr. **Frank**. But don't the Governors then get a choice? They can use that 6 percent either for generalized technical assistance or incentives. But then there is less available for the incentive awards if part goes to technical assistance. Is that right?

Mr. **Jones**. No; they must use it for both.

Mr. **Frank**. In what proportions?

Mr. **Jones**. There is a tradeoff, sure, but——

Mr. **Frank**. So, there are no proportions as to how it will be spent?

Mr. **Jones**. Right.

Mr. **Frank**. Let me go back to the OMB question. You mentioned that you have been working under relatively short deadlines, 5 or 6 short months. I don't know how many days are in a short month, as opposed to a long month. Maybe we have had more Februaries than usual this year. [Laughter.]

The people out on the other end, obviously, are under those same constraints, and they are working very hard. I understand that some of the technical questions take time. I take it from what you are saying that OMB has been very cooperative with you in resolving the technical questions.

But it appears to me, both from what you have said and from what others have said, that the objections that OMB appears to have now with regard to the issue of a national reporting system and performance standards, are not so much technical as ideological. I don't know why those can't be resolved already. It seems to me just wrong for them to be delaying until July 26, the last possible date. OMB was asked to come and testify. They refused. They said they wouldn't do it until July 26. They are apparently going to squeeze out the very last drop of time available to them.

Are there technical problems here? It seems to me that it is more of an ideological issue or, if that is too high blown, a philosophical one. Maybe that is a politician's bias, that ideology is of a higher order than philosophy. It is a value question. But it seems that OMB is just saying that that is too much of a national role.

Wouldn't it be better for all concerned if we could get that resolved? We had a witness speaking both as a representative of the Conference of Mayors and as the San Francisco responsible official say that not knowing what the reporting system is going to be and what the performance standards are is a serious problem for them. It is forcing them to do more work than they would otherwise have to do because they may be over anticipating.

Why can't we get that one resolved?

Mr. **Angrisani**. The thrust of your question carries back to the 4 or 5 sets of regulations that we have already enacted.

It really comes right down to the role of a department in a process like this and the role of OMB. The Department had the lead in developing the legislation, and we did; and we developed a piece of legislation with the Congress which, as you know, passed 95 to 0 in the Senate and 387 to 14 in the House. It was obviously——

Mr. **Frank**. Mr. Angrisani, since we are all a bit constrained for time—and it is my fault because I was late—that that goes back too far to address the question as to why OMB is still hanging us up on this question.

Mr. **Angrisani**. There is some historical relevance here, but I will try to be briefer.

They have a role which is clearly to be sure that any program that we put out is cost efficient and doesn't in fact generate additional paperwork—paper burdens. I think they are approaching the job from that particular perspective.

Whereas, some of the principles that we have down on paper potentially trouble them in that area.

Mr. **Frank**. Everybody who testified on Tuesday, representing all the participating groups—the only people we didn't hear from were the people who are to be trained—like the States, the cities, from labor, from the PIC's, from the National Alliance of Businessmen, said that DOL has done the right thing and this will mean less paperwork for them right now if it were promulgated.

It is hard to understand that OMB is really talking about paperwork. I think it was Mr. Quinlan who was formerly with the Department of Labor and is now with the National Alliance of Businessmen that said, "No, OMB isn't concerned primarily with paperwork; it is more of a philosophical issue." They just don't want that much national presence, he said.

No one seems to think—my guess is, including you—that this is a paperwork issue. It is a philosophical question for OMB.

I have two points. One is why OMB is doing it. That is not your problem.

[Pause.]

Mr. **Frank**. Well, it is your problem. But why can't we get it resolved? There is nothing to be gained by this delay. I don't know why the Secretary and the Director haven't taken it to the White House if they have to. They are still going to have to wait a couple more weeks.

The issue seems fairly clear. It disserves everybody who is trying to do the job, including you. I think you are the victim of this, obviously. It is unfortunate not to have OMB here.

Mr. **Angrisani**. This is the last element of the regulations, as you know. The system will not be turned upside down or fail if we have another 1 or 2 weeks involved in discussions. Of course, I would like to see it done ahead of time, but all I can say is that there are two different approaches here in terms of——

Mr. **Frank**. What is the approach? Other than paperwork, which I must tell you I do not think is seriously their concern because there is going to be reporting, are there valid objections to the kind of national requirements for reporting that you have set down? I must say, as a Member of Congress who is going to have to decide whether we continue, expand, change, or contract this program, that what you have asked for is essential data. I think you feel the same way.

What possible objection could anyone have to the linkage of the performance standards and reporting of requirements. Here you are working with the local communities. They are saying that the proposal is exactly right and it is very much what they want. You, who are the operating agency at the Federal level, the Governors, the mayors, the private sector, and organized labor all say "This works well."

What in the world is OMB accomplishing by hanging it all up this way? What goals are they trying to serve?

Mr. **Angrisani**. Well, the goals they are trying to serve are just to do what they think—I think they all agree with us that we have to have performance standards and we have to have a reporting system and they did sign off on the legislation and they know it is in the law.

I think what they are potentially at odds with us on is how to do it.

Mr. **Frank**. Have they told you what it is they don't like about your system? I assume they have.

Mr. **Angrisani**. It is a little touchy for me because we are in the middle of negotiating the differences out with them. I believe to some extent those negotiations are between principals, and it is kind of hard, while they are undergoing it, to talk about them in the open because I think we can resolve them.

But I think I can say this in good faith——

Mr. **Frank**. Neither one of you have secceded from the U.S. Government lately; correct? We are not dealing with sovereign principalities here who have to follow the Geneva Convention in their relationships.

Mr. **Angrisani**. I am from New Jersey, and the southern part of the State is thinking about that so——

Mr. **Frank**. I was from the northern part, and I don't think we would have missed them. [Laughter.]

Mr. **Angrisani**. You would from a tax standpoint, I will tell you.

Mr. **Frank**. That is true. That was precasino when I was there.

Mr. **Angrisani**. That is right; that was precasino.

Mr. **Frank**. What are the concerns? If we did not have what you have asked for in terms of reporting and performance standards—which seem to me to be linked in direction—what happends. Suppose we had no uniform national reporting standards, then what kind of shape would you be in next year when we ask you to tell us how well things were working, which techniques and which States it seemed to be working well, et cetera? Do you think you would be able to do that?

Mr. **Angrisani**. With regard to performance standards?

Mr. **Frank**. And the national reporting?

Mr. **Angrisani**. We have the authority for national reporting and performance standards in our regulations already, I think.

Mr. **Frank**. Have they been approved by OMB?

Mr. **Angrisani**. Yes; they were part of the first package of regulations that went through. But that is really not at issue here.

Mr. **Frank**. But what is reported is the question.

Mr. **Angrisani**. The point of contention is on the performance standards and how we report the output data side of that. We have the input.

So, what we laid out in interim standards we feel gives us the ability to give you the information——

Mr. **Frank**. Suppose you didn't have those. Suppose OMB decides that you can't have those performance standards and the States can just do what they want.

Mr. **Angrisani**. On the output side, meaning just on performance standards? I think your question was if they said that we would have no reporting at all and the States would just do——

Mr. **Frank**. No performance standards.

Mr. **Angrisani**. With no performance standards at all, I would be in a difficult position to give you the output data that you wanted.

We are not arguing about that. We are arguing about how to collect the output data from a national perspective. I don't think that the debate is that broad. I think it is a question of, yes, we need the data because we have to give it to you. But how do you get it?

Mr. **Frank**. Then what is the issue over? I think you are minimizing it beyond what it really is, but then you have to explain it to me.

Mr. **Angrisani**. I think the issue is the number of variables that you request, the range of variables in the information because that has a direct relationship to the burdens that you place on the States in terms of reporting. It is the method in which you collect them through either——

Mr. **Frank**. If you were running a State program and you have set down certain performance standards in your draft, then are not these things you would want to know anyway? Is there additional information that people running the program are going to have to collect. Or do you see it as simply a question of how much of it they send on to the Federal level?

Mr. **Angrisani**. Mr. Chairman, I guess it is like any statistical system. You can have all the data you want. I dare say that if you left it up to every State, then a lot of them would probably do it significantly differently than the others, and it would probably depend on the size of the State, the demographics, and a lot of other things.

Mr. **Frank**. Why don't we do that?

Mr. **Angrisani**. Our approach is that in order to have a national perspective, which is one of the charges of the law, that is, to maintain a national reporting system, that we have to have some elements of consistency.

I think the debate really narrows on how many and how specifically they are collected. I do believe the debate is that narrow, which is why I am somewhat confident of resolving it.

I don't think there are any white hats and black hats in this. I am, maybe, not as sensitive to it as you all are because I have been with it——

Mr. **Frank**. With such a narrow difference, I think all the less reason for it having dragged on so long. You are causing stress. If it is such a narrow difference, then maybe you ought to give in. Why are you being so adamant if it is such a narrow, technical difference?

Mr. **Angrisani**. I don't like to lose.

Mr. **Frank**. Your sense of combativeness is hardly reason for delaying. We had everybody participating in this program—the people you are giving money to, all the people who have got to run this thing—coming in and saying, "Look, this is holding us up; it is a serious problem for us."

I would hope that more is at stake than whether you win or lose.

Mr. **Angrisani**. Of course.

Mr. **Frank**. I think there is. I think you are understating it, and I appreciate your sense of loyalty, but I think there is a very serious problem here with OMB's attitude.

I think you are right. What you are talking about is what the act contemplates. I think that OMB, having lost the fight by as you said, signing off on the legislation, intended to reopen that fight later in the implementation phase.

What you have proposed seems to me a reasonable minimum for maintaining a national perspective. If more was not at stake, I don't think you would be delaying this thing this long. We have OMB really interferring with our ability to run a national program. For the Office of Management—it is not just Management and Budget—of the Federal Government to be interferring with what everybody thinks is a useful management tool is a mistake.

Let me ask you one other procedural question. Has OMB talked to any of the people involved in this? They tell us OMB has not.

OMB is making this defense of the States and objecting to paperwork and so on when they haven't talked to the governors; they haven't talked to the mayors; they haven't talked to the private industry councils; they haven't talked to the National Alliance of Business; and they haven't talked to the AFL-CIO. But I guess it is hardly worth noting that they haven't talked to anybody else who is supposed to be running it.

From the procedural standpoint, that is not a reasonable way to go. You have worked with those people. It seems to me we have a very poor debate here in which you are informed and have worked with the participants, and OMB is operating from a very rigid ideological perspective. They have not gotten information from the others, unless somebody pilfered the information and it made its way to them that way. But no one is suggesting that.

Should not OMB be talking to these people?

Mr. ANGRISANI. That is a tough one for me to answer.

Mr. FRANK. That is answer enough, then.

I don't mean to press it.

Mr. ANGRISANI. I would like to point out, though, that I think that the prescribed deadline for the completion of the performance standards is January 1984. We could have it done sooner if the debate were not flourishing, that is correct, but we are not in any danger of jeopardizing——

Mr. FRANK. Except for this. I understand what you are saying, but, as you know, this is a layered program. There is a State and local layer. It is true that, it only got started in January, but we are now in July. You talk about having only 5 or 6 months yourself. It will be August by the time it starts, and you have that State/Federal process to conclude.

The operating levels of government and of private industry are going to be given inadequate time here.

I think that this is a procedural question that goes beyond this particular issue. If OMB is going to have this kind of authority, then I think there ought to be some mandate that they be available to talk with the affected groups.

To have OMB having this kind of veto power over the proposal, the ability to slow it down and not having to talk with the governors, mayors, PIC's, and the National Alliance of Business, and the labor people really disserves the process. I don't think they are making an informed decision because they just don't have the information. They don't have the information to deal with some of the practical questions. That is why I say that it doesn't seem to me that they could be as concerned with the practical administration of the program. It has to be an ideological concern. They don't want this to be a national program.

Mr. ANGRISANI. I understand your point, Mr. Chairman. I just want it to be clear for the record that January of 1984 is the deadline, and I don't want anybody to think that we are in jeopardy of missing that deadline.

Mr. FRANK. What do you mean?

Mr. ANGRISANI. In jeopardy of missing the deadline in terms of having our system up and operating.

Mr. FRANK. But what I am telling you is that this delay—according to the people who have to operate it—is going to impose serious problems. In fact, what several of them said is that this delay is causing them more paperwork because they have to be ready to do various different things.

If they knew now that your promulgation of April 26 was going to go into effect with regard to the performance standards, they would not only be further along, but they would be spending less time, less energy, having fewer meetings, and generate less paperwork. There probably would have been two fewer congressional hearings, which many of us would have been grateful for. But it seemed to me that we had to respond to this concern people have.

We have a process which is working well between the Labor Department and others. I understand OMB is reducing the paperwork. I guess it was Rousseau who wanted to force people to be free. David Stockman now appears to be in that guise. He is waging a fight to free States and cities and the business people and organized labor from a paperwork burden which they eagerly welcome. There are, perhaps, practices—and substances—from which mature adults must be restrained—although I am not, on the whole, in favor of that.

But this is to restrain them from doing paperwork against their will. This seems to me to be an odd role for OMB. That is what we have here. They all say, "Hey, Labor is right; let's just get to work." And here is OMB sitting there saying, "Oh, gee, no, you can't handle it."

Mr. ANGRISANI. I understand what you are saying and I appreciate it. There are many of these things that I agree with you on, but I want to be clear that I don't think Thomas Jefferson envisioned the performance standards of the JTPA Act as——

Mr. FRANK. I would agree with that. If David Stockman is sitting there trying to figure out what Thomas Jefferson would have done, then he is making a very grave error. I have a great deal of respect for Thomas Jefferson, but I don't think he is a good guide on what is the best way to train people for jobs who don't have proper skills in the year 1983.

Thank you very much, Mr. Angrisani. Again, my apologies for holding you up. I want to make sure the record reflects these apologies. There was no excuse for it.

Next, we will call Paula MacIlwaine, commissioner, Montgomery County, Ohio on behalf of the National Association of Counties.

STATEMENT OF PAULA MacILWAINE, COMMISSIONER, MONTGOMERY COUNTY, OHIO, ON BEHALF OF THE NATIONAL ASSOCIATION OF COUNTIES

Ms. MACILWAINE. Mr. Chairman, I would like to say something for the record. I would like to ask the distinguished chairman to consider changing the name of this subcommittee from "Manpower" to something that more appropriately reflects the total working community——

Mr. FRANK. You are right. I would like to put that on the record. Let the record show that Commissioner MacIlwaine has correctly pointed out that manpower is an inappropriately sexist phrase, and I will take up with the full committee chairman an appropriate change.

Thank you.

Ms. MACILWAINE. Thank you.

Mr. Chairman, honored members of the subcommittee, my name is Paula J. MacIlwaine, commissioner of Montgomery County, Ohio. I am here today to speak on behalf of the National Association of Counties where I chair the Employment Steering Committee.

The National Association of Counties is the only national organization representing county government in America. Its membership includes urban, suburban, and rural counties joined together for the common purpose of strengthening county government to meet the needs of all Americans. By virtue of a county's membership, all its elected and appointed officials become participants in an organization dedicated to the following goals: improving county government; serving as the national spokesman for county government; acting as a liaison between the Nation's counties and other levels of Government; and achieving the public understanding of the role of counties in the federal system.

I want to commend the subcommittee on your initiative in holding these important hearings to insure the proper implementation of federally funded job training programs across the United States.

Although the Nation's unemployment rate has dropped a few tenths of a percentage point in recent months, in Montgomery County and in many parts of the country it remains intolerable. Thus, the Job Training Partnership Act is important to the Nation's recovery from recession. We welcome the opportunity at this early stage of the implementation to comment on its progress. County officials have a major stake in the success of this program, and we are committed to making it work.

The National Association of Counties worked closely with members of this body and with the Senate to shape the legislation to succeed CETA. I testified for NACo many times in strong support of the concepts contained in the Job Training Partnership Act, and to insure that the partnership theme would include local elected officials in a meaningful way. We view the effectiveness of the partnership effort as the key element to insuring the success of JTPA. At this point, the involvement of local elected officials in the transition from CETA to JTPA is proceeding at an uneven pace.

A number of States did appoint local elected officials to their State councils, and there are more than 500 local government service delivery areas. The Employment Opportunities Subcommittee pointed out: "Those local programs are the heart and soul of the Job Training Partnership Act."

NACo is monitoring implementation and offering technical assistance through a DOL contract. We have encouraged county officials to participate with their States and the local private sector in selecting the Private Industry Council.

Because the act established new program designs and new responsibilities for Federal, State, and local sectors, proper implementation and transition will require an evolutionary process over the course of time. As JTPA unfolds and implementation problems are detected, I would caution the Congress against enacting major quick-fix amendments. A period of incubation is needed to allow the partnership activities under JTPA to gel and to iron out administrative problems.

Our observations today relate primarily to how this Administration, including the Labor Department and the Office of Management and Budget, is implementing portions of the act. To a lesser extent, we are concerned with decisions made by some States that we believe are contrary to the intent of the law.

Thus far we have witnessed problems early in the transition process at the State, local, and private sector levels. In many cases this has greatly slowed the selection of State council members, the designation of service delivery areas, the selection of PIC members, and the certification of PIC's. This may result in an even more protracted transition period for JTPA.

We have also seen several States make decisions that we believe are detrimental to the success of JTPA. For example, the Missouri State Legislature recently enacted legislation imposing a 10-percent cap on local administrative costs. This not only infringes upon the authority of local program managers, but also limits the ability of local governments to hire adequate staff to insure effective program management. Local government will ultimately be responsible for any program failures and should receive a sufficient level of funding.

In another case—as has already been mentioned—the Government of New Hampshire ruled that counties in that State could not be designated as service delivery areas based on a belief that the counties did not meet the definition of a unit of general purpose government. The counties appealed and the Secretary of Labor upheld the Governor's decision.

The decision is currently under petition with the First Circuit Court of Appeals in Boston, Mass.

This case has major implications for county governments in America with respect to their fundamental rights as units of government to operate federally funded programs.

Specific issues that NACo is concerned about in the implementation include: (1) SDA funding protection, (2) national reporting systems, (3) performance standards, and (4) liability.

As for SDA funding protection, we strongly urge that Congress authorize a one-time appropriation that will hold counties and other substate jurisdictions harmless for the transition year.

In distributing title II funds to the States, the act allowed for a hold-harmless allocation equal to 90 percent of their percentage share of the previous year's allocation. Individual substate allocations do not get the benefit of this hold-harmless provision. Our analysis of the JTPA formula shows that urban counties will suffer significantly unless there is a substate hold-harmless allocation. The special appropriation would provide protection for the service delivery areas that the law provides for States, without tampering with the allocation formula. It would help to insure a smooth transition in some of the larger local jurisdictions that have unemployment rates higher than their rural counterparts that gain funds under the formula.

As for a national reporting system, on April 26 the Department of Labor published draft national reporting requirements for JTPA. This proposed national reporting system will not limit State or local managerial prerogatives in designing their management information systems, but will assure that the same information is collected on a national basis. Without these standards different information would be collected by each State.

For example, Ohio is going to require more reports and more detailed reporting than was ever required by DOL. Ohio is talking about requiring SDAs to send a copy of every participant's application form to the Columbus JTPA office. They are also talking about monthly instead of quarterly participant reports and monthly line item financial reports instead of quarterly summary financial reporting. While the States will require some more information for effective management, the States should be encouraged to keep reporting requirements to a minimum, especially in light of new 15 percent administration restrictions.

NACo supports the Department of Labor's reporting system, however, final approval for its implementation must come from OMB. Preliminary indications from OMB suggest lack of support because of a perceived intrusion upon the States flexibility under JTPA. Title II of JTPA establishes an employment and training system which, although administered by States and operated by local service delivery areas, is a totally federally funded, national system which merits standardized reporting that is consistent across the States. In this way, coherent and comparable reports on JTPA may be generated for the Congress.

We agree with the Chair that something needs to be done about this whole process with OMB. We have placed several calls to OMB asking for information and have gotten no response whatsoever.

In a related matter, we are concerned that final regulations issued on March 15 did not establish nationally consistent definitions of a JTPA participant's family and what constitutes family income—two constructs fundamental to determining participant eligibility. If there is no national standard by which individuals will be deemed eligible, each State has the authority to define eligibility differently. In a program as targeted to the economically disadvantaged as JTPA is, Congress surely did not intend for this determination to vary from State to State. We believe that consistent definitions of participant eligibility would permit meaningful comparisons of program performance among the States and allow programs to be audited in a consistent fashion. We urge the administration to correct this oversight immediately, while the local planning is just getting underway.

As for performance standards, on April 26, the Department of Labor also published its proposed methodology for calculating performance standards which considers local variations in economic conditions, client characteristics, and program design. It is intended for implementation effective July 1, 1984. NACo has worked closely with the department in the development of this methodology and we strongly suggest its adoption nationwide. OMB, however, is reviewing the methodology as part of its review of the national reporting system. Our concern is that the OMB opposition might result in eliminating both the reporting system and the methodology for calculating performance standards that we strongly support.

We do object to the performance standards to be issued for the first 9 months of JTPA which were published by DOL April 12. These standards were based on national averages. For example, DOL has established an entered employment rate of 58 percent and a cost-per-entered employment of $5,900. These standards do not consider local economic conditions. It is unfair to impose national standards on areas in the Midwest, such as Montgomery County, Ohio, where the local economy is so dependent on the auto and steel industry. We would not want to be programed for failure. NACo supports a recalculation of performance assumptions during the JTPA phase in.

While we hope that JTPA may eventually yield greater efficiency and effectiveness than was the CETA experience, I am confident that this 9-month period will not reflect those achievements. The Department of Labor, itself, has characterized this period as transitional and experimental in nature. It is vital that the job training system be initiated in a matter that is fair to all the partners, old and new.

As for liability, we urge that audit guidelines be produced and disseminated quickly so that State and local officials will know in advance how their liabilities will be assessed. Should the Department of Labor publish audit standards 2 years into JTPA and apply them retroactively—a practice common under CETA—local governments will be unfairly burdened.

Under JTPA, the Federal Government holds the Governor liable, who in turn holds the SDA grant recipient liable. The act also provides a four-factor waiver from liability which, if granted by the Labor Secretary, releases the recipient from liability. The Department's regulations define the Governor as the recipient, thus, denying local officials access to the Secretary for consideration of the liability waiver.

NACo strongly urges that the regulations be changed to reflect this goal of equal access. We do not believe Congress intended to establish separate standards of liability for Governors and local elected officials. As public officials, we are all accountable and, thus, should be entitled to the same protections.

Thank you for the opportunity to present our concerns of the county officials. I will be glad to answer any questions you have.

[The prepared statement of Ms. MacIlwaine follows:]

NATIONAL
ASSOCIATION
of
COUNTIES

440 First St. NW, Washington, DC 20001
202/393-6226

STATEMENT OF

PAULA MacILWAINE

COMMISSIONER

MONTGOMERY COUNTY, OHIO

ON BEHALF OF

THE NATIONAL ASSOCIATION OF COUNTIES

BEFORE THE

MANPOWER AND HOUSING SUBCOMMITTEE

HOUSE GOVERNMENT OPERATIONS COMMITTEE

HEARINGS ON JTPA IMPLEMENTATION

JULY 14, 1983

WASHINGTON, D.C.

MR. CHAIRMAN, HONORED MEMBERS OF THE SUBCOMMITTEE, MY NAME IS PAULA J. MACILWAINE, COMMISSIONER OF MONTGOMERY COUNTY, OHIO. I AM HERE TODAY TO SPEAK ON BEHALF OF THE NATIONAL ASSOCIATION OF COUNTIES* WHERE I CHAIR THE EMPLOYMENT STEERING COMMITTEE.

I WANT TO COMMEND THE SUBCOMMITTEE ON YOUR INITIATIVE IN HOLDING THESE IMPORTANT HEARINGS TO ENSURE THE PROPER IMPLEMENTATION OF FEDERALLY FUNDED JOB TRAINING PROGRAMS ACROSS THE UNITED STATES.

ALTHOUGH THE NATION'S UNEMPLOYMENT RATE HAS DROPPED A FEW TENTHS OF A PERCENTAGE POINT IN RECENT MONTHS, IN MONTGOMERY COUNTY AND IN MANY PARTS OF THE COUNTRY IT REMAINS INTOLERABLE. THUS, THE JOB TRAINING PARTNERSHIP ACT IS IMPORTANT TO THE NATION'S RECOVERY FROM RECESSION. WE WELCOME THE OPPORTUNITY AT THIS EARLY STAGE OF THE IMPLEMENTATION TO COMMENT ON ITS PROGRESS. COUNTY OFFICIALS HAVE A MAJOR STAKE IN THE SUCCESS OF THIS PROGRAM, AND WE ARE COMMITTED TO MAKING IT WORK.

THE NATIONAL ASSOCIATION OF COUNTIES WORKED CLOSELY WITH MEMBERS OF THIS BODY AND WITH THE SENATE TO SHAPE THE LEGISLATION TO SUCCEED CETA. I TESTIFIED FOR NACo MANY TIMES IN STRONG SUPPORT OF THE CONCEPTS CONTAINED IN THE JOB TRAINING PARTNERSHIP ACT, AND TO ENSURE THAT THE PARTNERSHIP THEME WOULD INCLUDE LOCAL ELECTED OFFICIALS IN A MEANINGFUL WAY. WE VIEW THE EFFECTIVENESS OF THE PARTNERSHIP EFFORT AS THE KEY ELEMENT TO ENSURING THE SUCCESS OF JTPA. AT THIS POINT, THE INVOLVEMENT OF LOCAL ELECTED OFFICIALS IN THE TRANSITION FROM CETA TO JTPA IS PROCEEDING AT AN UNEVEN PACE.

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*THE NATIONAL ASSOCIATION OF COUNTIES IS THE ONLY NATIONAL ORGANIZATION REPRESENTING COUNTY GOVERNMENT IN AMERICA. ITS MEMBERSHIP INCLUDES URBAN, SUBURBAN AND RURAL COUNTIES JOINED TOGETHER FOR THE COMMON PURPOSE OF STRENGTHENING COUNTY GOVERNMENT TO MEET THE NEEDS OF ALL AMERICANS. BY VIRTUE OF A COUNTY'S MEMBERSHIP, ALL ITS ELECTED AND APPOINTED OFFICIALS BECOME PARTICIPANTS IN AN ORGANIZATION DEDICATED TO THE FOLLOWING GOALS: IMPROVING COUNTY GOVERNMENT; SERVING AS THE NATIONAL SPOKESMAN FOR COUNTY GOVERNMENT; ACTING AS A LIAISON BETWEEN THE NATION'S COUNTIES AND OTHER LEVELS OF GOVERNMENT; AND ACHIEVING THE PUBLIC UNDERSTANDING OF THE ROLE OF COUNTIES IN THE FEDERAL SYSTEM.

A NUMBER OF STATES DID APPOINT LOCAL ELECTED OFFICIALS TO THEIR STATE COUNCILS, AND THERE ARE MORE THAN 500 LOCAL GOVERNMENT SERVICE DELIVERY AREAS. THE EMPLOYMENT OPPORTUNITIES SUBCOMMITTEE POINTED OUT, "THOSE LOCAL PROGRAMS ARE THE HEART AND SOUL OF THE JOB TRAINING PARTNERSHIP ACT."

NACo IS MONITORING IMPLEMENTATION AND OFFERING TECHNICAL ASSISTANCE THROUGH A DOL CONTRACT. WE HAVE ENCOURAGED COUNTY OFFICIALS TO PARTICIPATE WITH THEIR STATES AND THE LOCAL PRIVATE SECTOR IN SELECTING THE PRIVATE INDUSTRY COUNCIL.

BECAUSE THE ACT ESTABLISHES NEW PROGRAM DESIGNS AND NEW RESPONSIBILITIES FOR FEDERAL, STATE AND LOCAL ACTORS, PROPER IMPLEMENTATION AND TRANSITION WILL REQUIRE AN EVOLUTIONARY PROCESS OVER THE COURSE OF TIME. AS JTPA UNFOLDS AND IMPLEMENTATION PROBLEMS ARE DETECTED, I WOULD CAUTION THE CONGRESS AGAINST ENACTING MAJOR QUICK-FIX AMENDMENTS. A PERIOD OF INCUBATION IS NEEDED, TO ALLOW THE PARTNERSHIP ACTIVITIES UNDER JTPA TO GEL AND TO IRON OUT ADMINISTRATIVE PROBLEMS.

OUR OBSERVATIONS TODAY RELATE PRIMARILY TO HOW THIS ADMINISTRATION, INCLUDING THE LABOR DEPARTMENT AND THE OFFICE OF MANAGEMENT AND BUDGET, IS IMPLEMENTING PORTIONS OF THE ACT. TO A LESSER EXTENT, WE ARE CONCERNED WITH DECISIONS MADE BY SOME STATES THAT WE BELIEVE ARE CONTRARY TO THE INTENT OF THE LAW.

THUS FAR WE HAVE WITNESSED PROBLEMS EARLY IN THE TRANSITION PROCESS AT THE STATE, LOCAL AND PRIVATE SECTOR LEVELS. IN MANY CASES THIS HAS GREATLY SLOWED THE SELECTION OF STATE COUNCIL MEMBERS, THE DESIGNATION OF SERVICE DELIVERY AREAS, THE SELECTION OF PIC MEMBERS, AND THE CERTIFICATION OF PICS. THIS MAY RESULT IN AN EVEN MORE PROTRACTED TRANSITION PERIOD FOR JTPA.

WE HAVE ALSO SEEN SEVERAL STATES MAKE DECISIONS THAT WE BELIEVE ARE DETRIMENTAL TO THE SUCCESS OF JTPA. FOR EXAMPLE, THE MISSOURI STATE LEGISLATURE RECENTLY ENACTED LEGISLATION IMPOSING A 10 PERCENT CAP ON LOCAL ADMINISTRATIVE COSTS. THIS NOT ONLY INFRINGES UPON THE AUTHORITY OF LOCAL PROGRAM MANAGERS, BUT ALSO LIMITS THE ABILITY OF LOCAL GOVERNMENTS TO HIRE ADEQUATE STAFF TO ENSURE EFFECTIVE PROGRAM MANAGEMENT. LOCAL GOVERNMENT WILL ULTIMATELY BE RESPONSIBLE FOR ANY PROGRAM FAILURES AND SHOULD RECEIVE A SUFFICIENT LEVEL OF FUNDING.

IN ANOTHER CASE, THE GOVERNOR OF NEW HAMPSHIRE RULED THAT COUNTIES IN THAT STATE COULD NOT BE DESIGNATED AS SERVICE DELIVERY AREAS BASED ON A BELIEF THAT THE COUNTIES DID NOT MEET THE DEFINITION OF A UNIT OF GENERAL PURPOSE GOVERNMENT. THE COUNTIES APPEALED AND THE SECRETARY OF LABOR UPHELD THE GOVERNOR'S DECISION.

THE DECISION IS CURRENTLY UNDER PETITION WITH THE FIRST CIRCUIT COURT OF APPEALS IN BOSTON, MASSACHUSETTS.

THIS CASE HAS MAJOR IMPLICATIONS FOR COUNTY GOVERNMENTS IN AMERICA WITH RESPECT TO THEIR FUNDAMENTAL RIGHTS AS UNITS OF GOVERNMENT TO OPERATE FEDERALLY FUNDED PROGRAMS.

SPECIFIC ISSUES THAT NACo IS CONCERNED ABOUT IN THE IMPLEMENTATION INCLUDE:

- SDA FUNDING PROTECTION
- NATIONAL REPORTING SYSTEMS
- PERFORMANCE STANDARDS
- LIABILITY

1. SDA FUNDING PROTECTION

WE STRONGLY URGE THAT CONGRESS AUTHORIZE A ONE-TIME APPROPRIATION THAT WILL HOLD COUNTIES AND OTHER SUBSTATE JURISDICTIONS HARMLESS FOR THE TRANSITION YEAR.

IN DISTRIBUTING TITLE II FUNDS TO THE STATES, THE ACT ALLOWED FOR A HOLD-HARMLESS ALLOCATION EQUAL TO 90 PERCENT OF THEIR PERCENTAGE SHARE OF THE PREVIOUS YEAR'S ALLOCATION. INDIVIDUAL SUBSTATE ALLOCATIONS DO NOT GET THE BENEFIT OF THIS HOLD-HARMLESS PROVISION. OUR ANALYSIS OF THE JTPA FORMULA SHOWS THAT URBAN COUNTIES WILL SUFFER SIGNIFICANTLY UNLESS THERE IS A SUBSTATE HOLD-HARMLESS ALLOCATION. THE SPECIAL APPROPRIATION WOULD PROVIDE PROTECTION FOR THE SERVICE DELIVERY AREAS THAT THE LAW PROVIDES FOR STATES, WITHOUT TAMPERING WITH THE ALLOCATION FORMULA. IT WOULD HELP TO ENSURE A SMOOTH TRANSITION IN SOME OF THE LARGER LOCAL JURISDICTIONS THAT HAVE UNEMPLOYMENT RATES HIGHER THAN THEIR RURAL COUNTERPARTS THAT GAIN FUNDS UNDER THE FORMULA.

2. NATIONAL REPORTING SYSTEM

ON APRIL 26, THE DEPARTMENT OF LABOR PUBLISHED DRAFT NATIONAL REPORTING REQUIREMENTS FOR JTPA. THIS PROPOSED NATIONAL REPORTING SYSTEM WILL NOT LIMIT STATE OR LOCAL MANAGERIAL PREROGATIVES IN DESIGNING THEIR MANAGEMENT INFORMATION SYSTEMS, BUT WILL ASSURE THAT THE SAME INFORMATION IS COLLECTED ON A NATIONAL BASIS. WITHOUT THESE STANDARDS DIFFERENT INFORMATION WOULD BE COLLECTED BY EACH STATE.

FOR EXAMPLE, OHIO IS GOING TO REQUIRE MORE REPORTS AND MORE DETAILED REPORTING THAN WAS EVER REQUIRED BY DOL. OHIO IS TALKING ABOUT REQUIRING SDAS TO SEND A COPY OF EVERY PARTICIPANT'S APPLICATION FORM TO THE COLUMBUS JTPA OFFICE. THEY ARE ALSO TALKING ABOUT MONTHLY INSTEAD OF QUARTERLY PARTICIPANT REPORTS AND MONTHLY LINE ITEM FINANCIAL REPORTS INSTEAD OF QUARTERLY SUMMARY FINANCIAL REPORTING. WHILE THE STATES WILL REQUIRE SOME MORE INFORMATION FOR EFFECTIVE MANAGEMENT, THE STATES SHOULD BE ENCOURAGED TO KEEP REPORTING REQUIREMENTS TO A MINIMUM, ESPECIALLY IN LIGHT OF NEW 15 PERCENT ADMINISTRATION RESTRICTIONS.

NACo SUPPORTS THE DEPARTMENT OF LABOR'S REPORTING SYSTEM; HOWEVER, FINAL APPROVAL FOR ITS IMPLEMENTATION MUST COME FROM OMB. PRELIMINARY INDICATIONS FROM OMB SUGGEST LACK OF SUPPORT BECAUSE OF A PERCEIVED INTRUSION UPON THE STATES' FLEXIBILITY UNDER JTPA. TITLE II OF JTPA ESTABLISHES AN EMPLOYMENT AND TRAINING SYSTEM WHICH, ALTHOUGH ADMINISTERED BY STATES AND OPERATED BY LOCAL SERVICE DELIVERY AREAS, IS A TOTALLY FEDERALLY-FUNDED, NATIONAL SYSTEM WHICH MERITS STANDARDIZED REPORTING THAT IS CONSISTENT ACROSS THE STATES. IN THIS WAY, COHERENT AND COMPARABLE REPORTS ON JTPA MAY BE GENERATED FOR THE CONGRESS.

IN A RELATED MATTER, WE ARE CONCERNED THAT FINAL REGULATIONS ISSUED ON MARCH 15 DID NOT ESTABLISH NATIONALLY CONSISTENT DEFINITIONS OF A JTPA PARTICIPANT'S "FAMILY" AND WHAT CONSTITUTES "FAMILY-INCOME"--TWO CONSTRUCTS FUNDAMENTAL TO DETERMINING PARTICIPANT ELIGIBILITY. IF THERE IS NO NATIONAL STANDARD BY WHICH INDIVIDUALS WILL BE DEEMED ELIGIBLE, EACH STATE HAS THE AUTHORITY TO DEFINE ELIGIBILITY DIFFERENTLY. IN A PROGRAM AS TARGETED TO THE ECONOMICALLY DISADVANTAGED AS JTPA IS, CONGRESS SURELY DID NOT INTEND FOR THIS DETERMINATION TO VARY FROM STATE TO STATE. WE BELIEVE THAT CONSISTENT DEFINITIONS OF PARTICIPANT ELIGIBILITY WOULD PERMIT MEANINGFUL COMPARISONS OF PROGRAM PERFORMANCE AMONG THE STATES AND ALLOW PROGRAMS TO BE AUDITED IN A CONSISTENT FASHION. WE URGE THE ADMINISTRATION TO CORRECT THIS OVERSIGHT IMMEDIATELY, WHILE THE LOCAL PLANNING IS JUST GETTING UNDERWAY.

3. PERFORMANCE STANDARDS

ON APRIL 26, THE DEPARTMENT OF LABOR ALSO PUBLISHED ITS PROPOSED METHODOLOGY FOR CALCULATING PERFORMANCE STANDARDS WHICH CONSIDERS LOCAL VARIATIONS IN ECONOMIC CONDITIONS, CLIENT CHARACTERISTICS, AND PROGRAM DESIGN. IT IS INTENDED FOR IMPLEMENTATION EFFECTIVE JULY 1, 1984. NACo

HAS WORKED CLOSELY WITH THE DEPARTMENT IN THE DEVELOPMENT OF THIS METHODOLOGY AND WE STRONGLY SUGGEST ITS ADOPTION NATIONWIDE. OMB, HOWEVER, IS REVIEWING THE METHODOLOGY AS PART OF ITS REVIEW OF THE NATIONAL REPORTING SYSTEM. OUR CONCERN IS THAT THE OMB OPPOSITION MIGHT RESULT IN ELIMINATING BOTH THE REPORTING SYSTEM AND THE METHODOLOGY FOR CALCULATING PERFORMANCE STANDARDS THAT WE STRONGLY SUPPORT.

WE DO OBJECT TO THE PERFORMANCE STANDARDS TO BE ISSUED FOR THE FIRST NINE MONTHS OF JTPA WHICH WERE PUBLISHED BY DOL APRIL 12TH. THESE STANDARDS WERE BASED ON NATIONAL AVERAGES. FOR EXAMPLE, DOL HAS ESTABLISHED AN ENTERED EMPLOYMENT RATE OF 58 PERCENT AND A COST PER ENTERED EMPLOYMENT OF $5,900. THESE STANDARDS DO NOT CONSIDER LOCAL ECONOMIC CONDITIONS. IT IS UNFAIR TO IMPOSE NATIONAL STANDARDS ON AREAS IN THE MIDWEST (SUCH AS MONTGOMERY COUNTY, OHIO) WHERE THE LOCAL ECONOMY IS SO DEPENDENT ON THE AUTO AND STEEL INDUSTRY. WE WOULDN'T WANT TO BE PROGRAMMED FOR FAILURE. NACo SUPPORTS A RE-CALCULATION OF PERFORMANCE ASSUMPTIONS DURING THE JTPA PHASE IN.

WHILE WE HOPE THAT JTPA MAY EVENTUALLY YIELD GREATER EFFICIENCY AND EFFECTIVENESS THAN WAS THE CETA EXPERIENCE, I AM CONFIDENT THAT THIS NINE MONTH PERIOD WILL NOT REFLECT THOSE ACHIEVEMENTS. THE DEPARTMENT OF LABOR, ITSELF, HAS CHARACTERIZED THIS PERIOD AS TRANSITIONAL AND EXPERIMENTAL IN NATURE. IT IS VITAL THAT THE JOB TRAINING SYSTEM BE INITIATED IN A MATTER THAT IS FAIR TO ALL THE PARTNERS, OLD AND NEW.

4. LIABILITY

WE URGE THAT AUDIT GUIDE LINES BE PRODUCED AND DISSEMINATED QUICKLY, SO THAT STATE AND LOCAL OFFICIALS WILL KNOW IN ADVANCE HOW THEIR LIABILITIES WILL BE ASSESSED. SHOULD THE DEPARTMENT OF LABOR PUBLISH AUDIT STANDARDS TWO YEARS INTO JTPA AND APPLY THEM RETROACTIVELY (A PRACTICE COMMON UNDER CETA), LOCAL GOVERNMENTS WILL BE UNFAIRLY BURDENED.

UNDER JTPA, THE FEDERAL GOVERNMENT HOLDS THE GOVERNOR LIABLE, WHO IN TURN HOLDS THE SDA GRANT RECIPIENT LIABLE. THE ACT ALSO PROVIDES A FOUR-FACTOR WAIVER FROM LIABILITY, WHICH, IF GRANTED BY THE LABOR SECRETARY, RELEASES THE RECIPIENT FROM LIABILITY. THE DEPARTMENT'S REGULATIONS DEFINE THE GOVERNOR AS THE RECIPIENT, THUS, DENYING LOCAL OFFICIALS ACCESS TO THE SECRETARY FOR CONSIDERATION OF THE LIABILITY WAIVER.

NACo STRONGLY URGES THAT THE REGULATIONS BE CHANGED TO REFLECT THIS GOAL OF EQUAL ACCESS. WE DO NOT BELIEVE CONGRESS INTENDED TO ESTABLISH SEPARATE STANDARDS OF LIABILITY FOR GOVERNORS AND LOCAL ELECTED OFFICIALS. AS PUBLIC OFFICIALS, WE ARE ALL ACCOUNTABLE AND THUS, SHOULD BE ENTITLED TO THE SAME PROTECTIONS.

THANK YOU FOR THE OPPORTUNITY TO PRESENT THE CONCERNS OF COUNTY OFFICIALS. I WILL ANSWER ANY QUESTIONS.

CIS

Mr. **Frank**. Thank you. I want to mention that we have been joined by our colleague, Mr. Burton.

We will begin the questioning with Mr. McKernan.

Mr. **McKernan**. Thank you, Mr. Chairman.

I would like to followup on the New Hampshire situation. Coming from Maine, I am interested in that, as a neighbor. I don't have any direct stake in the matter except to make sure that the program is implemented in a proper way on a national basis.

What did you mean by your comment that counties could be jeopardized by the decision in New Hampshire?

Ms. **MacIlwaine**. We are very concerned that a ruling by a court in New Hampshire might be interpreted by the Department of Labor to mean that counties are not a unit of local government and this might affect other Federal programs that counties now and will in the future operate.

Although in New Hampshire, in 1973, a court ruling did indicate that counties were units of local government and present would fit into the category and so now would be eligible to be an SDA but perhaps not in the same circumstances, we are hoping that that ruling will again occur when this case is decided in New Hampshire.

We are concerned about what effect this may have on other Federal programs.

Mr. **McKernan**. I am not really clear what the decision was by the Governor. I understand how it was confirmed by DOL and how that really related to counties. I know in Maine we have one county that is an SDA.

Ms. **MacIlwaine**. As I understand it, the counties in New Hampshire applied for SDA designation, and under the act they have to be units of general purpose government. The Governor in New Hampshire determined that counties did not fit that category and, therefore, denied their SDA designation.

Mr. **McKernan**. Was it based on the fact that they were not units of local government or that they were not governmental units?

Ms. **MacIlwaine**. I believe the term was units of local government, that is, units of general purpose government.

Mr. **McKernan**. There is a distinction between that and local government.

Ms. **MacIlwaine**. Yes; that is correct.

Mr. **McKernan**. I have not heard too much testimony, really, on the record, anyway, about some of the changes in the administrative costs. I wondered if you had any comment on that. I mean administrative allocations.

It is my understanding that we hear a lot about going from 20 to 15 percent but that 15 percent is really of less than the 100 percent so that in fact it is greater than a 5-percent reduction in administrative costs for the program.

Ms. **MacIlwaine**. I am not sure that we know what effect it is going to have. I guess it boils down to how many new regulations the States are going to impose on us that we would have to hire people in order to run the program and how that is going to affect the administrative costs and whether we have enough money.

One great concern I have—and I testified last year before another committee—is the State-by-State buildup of bureaucracies to run these programs. It seems to me that this committee ought to take a look at if in fact the Federal Government is reducing the number of Federal employees it had running the same program under CETA in order for the administrative money to be transferred to the States to have their bureaucracy.

What we are seeing is that now we are going to have three bureaucracies running this program—a Federal one, a State one, and a local one. That means that less dollars will go to the participants and fewer people will be trained if there are more bureaucractic people having using up the costs of the program.

Mr. **McKernan**. Am I incorrect in my understanding that, given the fact that approximately the same amount of money is going to be going to each State for the programs, 22 percent is going to be taken off the top by the States for the administration and that it is going to be the 78 percent that is going to be distributed to the various programs, instead of the 100 percent that is now being distributed?

Ms. **MacIlwaine**. That is correct, yes.

Mr. **McKernan**. Could you expand on your comment—and I may have missed the first part of your sentence—about talking about OMB?

Ms. **MacIlwaine**. Yes. I wanted to reiterate that we have had similar problems getting information from OMB. The National Association of Counties has called them and asked them for information about performance standards, and the response has been rather negligible at this point.

Mr. **McKernan**. You talked about the difference between family versus family income in your statement and the definitions. You heard the response of the people from the Department of Labor about the fact that they were really talking about people on the periphery and that it is going to have a negligible impact on the basis that those definitions really are not going to have an impact because we are really talking about disadvantaged, anyway.

Would you like to have equal time?

Ms. **MacIlwaine**. As I said earlier, I don't really believe the Department of Labor answered that question that performance is going to be based on how the eligibility is determined and if each State has a different standard for one of the major eligibility requirements, then it is going to be very difficult. You are going to be measuring one State against another, and I can see States trying to define their family to probably make them look better than perhaps other States. I think that is a serious problem, and NACo thinks it is a serious problem. We will be looking at that problem trying to get some research on it. Perhaps we can present the committee with some other arguments at a later time when we gather more information.

Mr. **Frank**. Without objection, the record will remain open to receive that information and it will be inserted into the record at this point.

[The material follows:]

Attachment A

Family definition

PERFORMANCE STANDARDS

While we support DOL's long-term strategy to establish performance standards using a regression analysis, we note several flaws in their policy which appear to be significant and violate the law (Section 106, JTPA).

Issues:

1. Comparability of national data: Because DOL did not define family and family income through the regulatory process, explicitly leaving this up to the states, each state could develop different standards for economically disadvantaged, thus having a direct bearing on basic participant eligibility determination.

The strength and validity of a regression model for performance standards is based upon consistency in data across the states. Without this consistency, Congress will not be able to know how JTPA really performs because performance will be subject to such basic variation as who's being served.

We recommend that DOL fulfill its statutory mandate and issue national definitions of family and family income.

2. Participant Follow-up: The law provides that performance standards should assess the long term impacts of the program. To accomplish this, data must be collected that provides information about program terminees (positive and negative) some time after leaving the program. This information, when compared with pre-intake information will yield impact data.

DOL policy requires SDAs to conduct participant contact follow-up activities 13 weeks after the individual exits the program. If there are enough terminees to construct a statistically reliable sample, SDAs may use such a sample.

It has been conservatively estimated that participant contact for follow-up will account for 5-8 percent of SDAs administrative funds. This is an extremely expensive drain on already cut administrative funds.

We recommend that DOL seek alternative follow-up methodologies such as using state U.I. files and employer reports. We realize that currently, this system is incomplete but we urge consideration of similar alternatives. If participant contact remains the only feasible method for the short-term, we recommend that DOL and the states share in these extraordinary costs. Without relief, SDAs will have to cut back on basic administrative controls which help perserve the integrity of the program.

PERFORMANCE STANDARDS FOR JTPA

Issue: National performance standards published by DOL on April 12 in the *Federal Register* are unrealistically high and are based on faulty assumptions about JTPA program performance for the first nine months of activity, starting October 1, 1983.

Background: Four adult and three youth measures have been selected to measure performance at the Service Delivery Area (SDA) level. These standards will assess gains made in employment and earnings and reductions in welfare costs. The seven standards for the first nine months were based, in part, upon national average performance in CETA for the first three quarters of FY'82. The Department of Labor also adjusted these averages by assuming reduced costs due to fewer wages paid to participants under JTPA; improved program efficiency, and improvements in the economy. With all of these assumptions factored in, the Department of Labor generated the following Secretary's Performance Standards:

Adult

1. Entered Employment Rate 58%
2. Cost per Entered Employment $5,900
3. Average Wage at Placement $4.90
4. Welfare Entered Employment Rate 41%

Youth

1. Entered Employment Rate 41%
2. Positive Termination Rate 82%
3. Cost per Positive Termination $4,900

We question the validity of the assumptions since during this initial period completely new programs and systems are being implemented for the first time. Even the Department has characterized it as "somewhat experimental and transitional." To add a 10 percent productivity factor to the national average data just doesn't square with a real life assessment of those first months under JTPA. And because the standards are based upon national average data, you will end up holding Flint, Michigan to the same standard as Houston, Texas.

Although no formal sanctions will be applied to SDAs who failed to meet the Secretary's Performance Standards, it will be embarrassing for state and local public officials and private sector leaders to not meet these standards. We believe that this will occur in many areas of the country experiencing depression-like economic conditions.

Finally, although the law requires the Secretary to establish parameters for his performance standards, this was ignored. Parameters provide a range of expected performance for each standard within which the Governor may determine specific SDA standards. Without parameters, the Governor could establish unrealistic, inconsistent and subjective performance goals for SDAs.

Recommended Action: Our overall recommendation is for the Department of Labor to develop performance standards that take into consideration the uniqueness of each SDA, that provide parameters of performance to the Governors, and that are based on real-life expectations of the first months of JTPA. For the short-term this would certainly include eliminating expectations of increased program productivity. As a first step, we recommend a re-calculation of the April 12 standards.

Mr. **McKernan**. You talked about the problem with the 58-percent figure for entered employment and the $5,900 cost. Do you know how DOL came up with that particular standard?

Ms. **MacIlwaine**. Yes. It is my understanding that they took a national average last year of around 48 percent and added an additional 10 percent. This standard is actually higher than the performance that they have had.

It is difficult because they actually have two performance standards, one for the first 9 months and then another one. I guess we are very concerned in that the first 9 months, which is the 9 months of transition, will to see difficulties because new operators will have difficulties—new PIC's and new local elected officials, they will not have been involved in this before. We are going to have difficulty in meeting that standard.

We are also greatly concerned that in some areas of the country the unemployment level is extremely high. In Ohio, for example, it is going to be difficult for us to place 58 percent of our trained JTPA recipients in jobs when we have an 11- or 12-percent unemployment rate in our own county.

So, we were recommending that, perhaps, there be some different standard in areas where unemployment is such a severe problem until we get the program rolling and until the economy improves.

Mr. **McKernan**. Have you talked with DOL about that concern?

Ms. **MacIlwaine**. Yes; we have.

Mr. **McKernan**. What was their response?

Ms. **MacIlwaine**. I am not sure. Let me consult with John Smith from the NACo staff.

Mr. **Smith**. Generally we have found that the Department, in the interest of trying to increase the performance in the programs, has thus established these standards.

Mr. **McKernan**. And, it is not in any way tied to the unemployment rate in the various areas, though; is that right?

Ms. **MacIlwaine**. No; it is not.

Mr. **McKernan**. Have you discussed that problem with them, that if there are fewer jobs to go around that it may be more difficult to have the higher placement rate?

Mr. **Smith**. I believe our staff has, yes.

Ms. **MacIlwaine**. Just to give you an example, in our county we think we run a very fine program. Last year was about—we actually placed about 38 percent of our participants at a cost of about $6,800. So, we thought we did a very good job last year in Ohio and in our county. We had a very well run program, and yet we could not have met this new standard that is being imposed in the first 9 months where we are going to have a new program.

Mr. **Frank**. If the gentleman will yield, is that the kind of thing which will be taken care of by the regression analysis? Is that one of the factors that would be dealt with in the regression analysis method?

Mr. **Smith**. Yes.

Mr. **McKernan**. Thank you, Mr. Chairman. I have no further questions.

Mr. **Frank**. Mr. Burton.

Mr. **Burton**. Thank you, Mr. Chairman.

You indicated that you thought that the Federal Government should have a one-time appropriation to hold counties harmless during the transition. Do you have any idea what that would cost, in addition to what has been appropriated?

Ms. **MacIlwaine**. No; I don't. But I do know that we just recently did a study on some of our urban counties and cuts they are going to receive the first year. Some of the counties are receiving a 61-percent cut, which is very difficult the first year of a new program to be cut to that extent.

If you are interested in that information, we can do an analysis of that and tell you how much——

Mr. **Burton**. I think it is essential if you are going to make that kind of a request of the Congress to know what the fiscal impact is going to be. We have to know how much money is going to be required before we can vote for it.

Ms. **MacIlwaine**. Sure. We will do that.

Mr. **Frank**. Without objection, the record will remain open to receive that information at this point.

[The material follows:]

Attachment.

NATIONAL
ASSOCIATION
of
COUNTIES

440 First St. NW, Washington, DC 20001
202/393-6226

July 26, 1983

The Honorable Thomas P. O'Neill
Chairman, Democratic Steering
and Policy Committee
U.S. House of Representatives
2231 Rayburn House Office Bldg.
Washington, D. C. 20515

Dear Mr. O'Neill:

The National Association of Counties urges your support for full funding of the Job Training Partnership Act in order to assure program continuity and a fast track start with the full involvement of local elected officials, the private sector, and governors.

We understand that the House Appropriations Subcommittee on Labor, Health and Human Services, and Education will recommend funding employment and training programs at levels near those set in the President's revised budget report.

Prior to full Appropriations Committee markup, we urge the House leadership to intervene and support full funding for the Job Training Partnership Act at levels set in the first concurrent budget resolution. Unemployment remains unacceptably high. Even the most optimistic projections indicate it will remain high through the end of this year. This is no time to cut into programs which offer job assistance and training for the unemployed. Specifically, we are asking for $4,564 million for the first year and $3,611 million for 9 months forward funding or a total availability over 21 months of $8,175 million.

If the President's budget figure is used, our analysis indicates that many urban areas will be cut by as much as 25 to 75 percent. For example, in some states, under the present JTPA formula, a number of counties running local programs which account for 50 percent of the state's total unemployed population can be cut by up to 25 percent, while other areas can receive substantial increases. Recent data for the following states show unusual reductions. Those states include: New York, Florida, Illinois, Maryland, Michigan, Oregon, Wisconsin, Arizona, Washington and Georgia (see attached for additional details).

We appreciate your consideration in this matter and look forward to discussing it in greater detail with you and your staff. Should you have any questions, please feel free to call on me or John Smith of my staff.

Sincerely,

Matthew B. Coffey

Matthew B. Coffey
Executive Director

NATIONAL
ASSOCIATION
of
COUNTIES

440 First St. NW, Washington, DC 20001
202/393-6226

(Attachment B)

Staff Contact: John Smith

FACT SHEET

SUB-STATE ALLOCATIONS

Issue:

- The Administration's Budget request and changes in the new Job Training Partnership Act final line formula threatens to cut back sharply on federal funds available to major urban counties for services to their unemployed residents in fiscal year 1984. See Attachment A.

Background:

- The cuts are occurring due to fewer funds being available nationally, and a new funding formula which hurts the urban county the most.

- In previous years a hold harmless existed to allow operating entities to receive at least 90 percent of their previous fiscal year funding.

- In addition to new budget authority, past federal employment and training programs have always had at least 15 percent more available from unspent funds from the previous year.

- Also of new budget authority, 10 percent less is available for SDAs in general this year.

Recommended Action:

(1) At least $3.8 billion is needed for Title II of JTPA in a budget conference Agreement to ensure adequate program delivery.

(2) Language should be added to ensure that SDAs do not experience a greater than 10 percent reduction in FY'84 allocations from their current FY'83 funding levels.

(3) Alternatively, a special once-only set aside should be established at the federal level to be used for those service delivery areas who experience a greater than 10 percent reduction in their FY'84 allocation.

(4) Governors who wish to do so should be permitted to use their 6% JTPA funds to supplement SDAs who experience a greater than 10% reduction in their Title II-A allocation.

kw

COMPARISONS OF FY'83 ALLOCATIONS AND FY'84 SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

KENTUCKY	Title II A FY'83	Title II A FY'84	% Change
Louisville/Jefferson Co.	6,365,751	5,090,275	- 20%
Eastern Kentucky CEP	10,331,249	5,077,762	- 51%
Balance	20,434,504	16,694,838	- 18%
KENTUCKY TOTAL	38,760,821	26,862,875	- 31%

COMPARISONS OF FY'83 ALLOCATIONS AND FY'84 SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

INDIANA (partial)	Title II A FY'83	Title II A FY'84	% Change
Indianapolis City and Merion County	7,397,645	4,048,245	- 45%
Gary and Hammond Cities and Lake County	6,209,916	3,692,132	- 41%
South Bend City and St. Joseph County	2,325,280	1,138,427	- 51%

COMPARISONS OF FY'83 ALLOCATIONS AND FY'84
SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

OHIO (partial)	Title II A FY'83	Title II A FY'84	% Change
Akron City, Medina and Summit Counties	5,530,448	4,204,323	- 24%
Butler County	2,230,351	1,688,592	- 24%
Cincinnati	4,757,441	3,667,227	- 23%
Clermont and Warren Counties	2,313,868	1,627,754	- 30%
Cleveland	7,675,013	6,372,047	- 17%
Columbus City and Franklin County	6,761,528	5,302,621	- 22%
Hamilton County	2,499,284	1,947,704	- 22%
Lake County	1,829,921	1,562,739	- 15%
Lorain County	3,389,632	2,723,464	- 20%
Columbiana and Mahoning Counties	2,753,986	2,412,002	- 12%
Dayton City, Mongtomery and Preble Counties	5,405,786	4,331,017	- 20%
Portage County	1,351,638	1,053,712	- 22 %
Toledo City, Lucas and Wood Counties	5,768,018	4,182,851	- 27%
Trumbull County	3,134,433	2,467,295	- 21%
Youngstown	1,823,278	1,612,274	- 12%

COMPARISONS OF FY'83 ALLOCATIONS AND FY'84 SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

ARIZONA	Title II FY'83	Title II FY'84	% Change
Phoenix	7,812,541	6,324,869	- 19%
Maricopa	4,970,617	4,559,895	- 8%
Pima/incl. Tucson	4,523,324	4,246,918	- 6%
BOS	8,091,407	10,026,936	+ 24%
ARIZONA TOTAL	25,397,889	25,158,618	- 1%

ARIZONA	Title II A FY'83	Title II A FY'84	% Change
Phoenix	5,579,891	4,289,664	- 23%
Maricopa	3,526,760	3,092,620	- 12%
Pima/Tucson	3,274,128	2,880,353	- 12%
BOS	6,163,888	6,800,488	+ 10%
ARIZONA TOTAL	18,544,667	17,063,125	- 8%

GEORGIA (partial)	Title II A FY'83	Title II A FY'84	% Change
Atlanta	4,614,441	3,634,484	- 21%
Central Savannah Csrt.	2,513,671	2,137,948	- 15%
DeKalb	1,619,270	941,736	- 42%
Middle Georgia Csrt.	1,855,944	1,398,559	- 25%
Savannah/Chatham Csrt.	1,286,404	1,050,056	- 18%

Comparison of FY'83 Allocations and FY'84 Substate Planning Estimates for Sample States

ILLINOIS	FY'83	FY'84	% Change
Champaign Csrt.	2,013,070	1,729,003	-14%
Chicago	52,969,345	42,188,453	-20%
Cook County	19,282,122	15,158,313	-21%
DuPage County	3,845,408	2,971,397	-23%
Kane County	2,818,995	2,631,723	- 7%
Lake County	3,445,615	2,599,832	-25%
Lincoln Csrt.	2,438,991	1,661,312	-32%
LaSalle County	1,473,737	1,265,409	-14%
Macon County	1,886,224	1,784,982	- 5%
Madison Csrt.	3,611,113	2,968,456	-18%
McHenry County	1,329,418	986,609	-26%
McLean County	1,047,709	912,796	-13%
Peoria Csrt.	2,558,455	2,301,617	-10%
Rock Island County	2,052,971	2,364,530	+15%
Rockford Csrt.	3,581,285	3,821,958	+ 7%
Shawnee Csrt.	1,252,341	1,012,740	-19%
St. Clair Csrt.	4,261,528	3,806,920	-11%
Taxewell County	1,345,995	1,317,886	- 2%
Will/Grundy Csrt.	3,638,342	3,438,094	- 6%
BOS	24,806,287	22,071,144	-11%
IL TOTAL	139,658,951	116,993,174	-16%

MARYLAND	FY'83	FY'84	% Change
Baltimore Csrt.	19,548,245	15,306,607	-22%
Baltimore County	7,052,109	5,513,990	-22%
Frederick County	1,147,605	960,323	-16%
Prince George's County	5,198,406	3,485,745	-33%
Montgomery County	2,114,221	832,507	-61%
Western MD Csrt	3,227,502	3,017,416	- 7%
BOS (now Lower Shore Southern MD, Susquehanna, and Upper Shore)	5,970,549	5,732,147	- 4%
MD Total	44,258,637	34,848,734	-21%

MICHIGAN (Partial)	FY'83	FY'84	% Change
Detroit	28,947,431	23,951,300	-17%
Region II Csrt.	4,304,519	3,803,200	-12%
Lansing Tri-County Csrt.	6,130,261	4,726,500	-23%
Muskegon-Oceana Csrt.	2,991,136	2,788,200	- 7%

WISCONSIN (Partial)	FY'83	FY'84	% Change
Madison-Dane Csrt.	2,645,535	2,087,413	-21%
Marathon County	1,404,377	1,098,179	-22%
Milwaukee Csrt.	10,118,132	9,408,608	- 7%
Northwest Wisconsin CEP	3,592,194	2,544,987	-29%
Rock County	2,221,863	1,947,961	-12%
Trico-CETAC Csrt.	4,334,687	3,451,420	-20%
WOW Csrt.	3,615,743	2,771,595	-23%

COMPARISON OF FY'83 ALLOCATIONS AND FY'84 SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

OREGON	Title II FY'83	Title II . FY-84	% Change
Clackamas	2,488,659	2,217,832	-11%
Eugene	1,384,339	1,171,517	-15%
Jackson-Josephine Csrt.	3,059,129	2,729,506	-11%
Lane	2,765,204	2,248,074	-19%
Mid-Willamette Csrt.	3,828,132	3,279,856	-14%
Multnomah-Washington Csrt.	4,075,730	3,456,185	-15%
Portland	5,371,972	4,453,247	-17%
Oregon Csrt. (BOS)	12,634,970	9,609,864	-24%
Oregon TOTAL	35,608,117	29,166,087	-18%

FLORIDA (partial)	Title II-A FY'83	Title II-A FY'84	% Change
Brevard	2,124,058	1,179,952	-44%
Broward Csrt.	6,048,771	3,761,138	-38%
Escambia	1,555,326	1,127,114	-28%
Heartland	5,159,237	3,793,826	-26%
Hillsborough	1,930,256	1,749,269	- 9%
Lee	1,284,047	952,621	-26%
Palm Beach	4,295,681	2,664,087	-38%
Pasco	1,456,870	939,140	-36%
St. Petersburgh/Pinellas Csrt.	4,283,831	2,595,064	-39%
Seminole	1,372,795	742,386	-46%
South Florida Csrt.	13,187,305	11,786,548	-11%
Tampa	2,842,204	1,729,944	-39%

COMPARISONS OF FY'83 ALLOCATIONS AND FY'84 SUBSTATE PLANNING ESTIMATES FOR SAMPLE STATES

PENNSYLVANIA (partial)	FY'83	Title II A FY'84	% Change
Allegheny County	7,459,848	5,975,910	- 20%
Erie County and City	2,671,989	1,904,861	- 29%
Beaver County	1,601,184	2,100,942	+ 31%
Burks County	2,831,086	1,817,111	- 36%
Bucks County	3,824,072	2,365,101	- 38%
Chester County	1,932,206	1,328,682	- 31%
Delaware County	4,043,719	2,417,159	- 40%
Fayette & Westmoreland	5,733,127	4,750,937	- 17%
Lackawanna Co. & Scranton	2,490,174	1,449,197	- 42%
Lancaster	2,351,842	1,542,042	- 34%
Lehigh & Northampton	4,465,747	3,187,547	- 29%
Butler, Armstrong & Indiana	3,327,094	2,585,364	- 22%
Philadelphia	17,582,760	11,932,417	- 32%
Pittsburgh	3,987,013	2,902,794	- 27%

JTPA FY 1984 PLANNING ESTIMATES

VS

CETA FY 1983 ALLOCATIONS

SDA	JTPA FY'84	CETA FY'83	PERCENT DIFFERENCE
NYC	80,001,382	$101,094,023	-20.9
Yonkers City	1,474,818	2,046,455	-27.9
Westchester Bal.	1,252,286	5,166,257	-75.8
Rockland Co.	640,662	1,902,520	-66.3
Orange Co.	2,033,565	2,443,337	-16.8
Dutchess Co. Putnam Co.	821,524	2,398,955	-65.8
Fulton Co. Montgomery Co. Schoharie Co.	1,628,267	1,853,815	-12.2
Warren Co. Washington Co. Saratoga Co.	2,159,604	2,751,619	-21.5
Chenango Co. Otsego Co. Delaware Co.	1,474,498	1,574,047	- 6.3
Oneida Co. Madison Co. Herkimer Co.	3,490,832	4,276,580	-18.4
Franklin Co. Clinton Co. Hamilton Co. Essex Co.	2,110,797	2,340,269	- 9.8
Jefferson Co. Lewis Co.	1,393,535	1,855,484	-24.9
St. Lawrence Co.	1,170,456	1,551,472	-24.6

SDA	EST. 1984 JTPA	FY'83 CETA ALLO.	PERCENT DIFFERENCE
Cayuga Co. Tompkins Co. Cortland Co.	2,056,736	1,965,365	+ 4.6
Tioga Co. Broome Co.	1,958,741	2,490,703	-21.4
Wayne Co. Ontario Co. Seneca Co. Yates Co.	2,223,564	2,430,102	- 8.5
Steuben Co. Schuyler Co. Chemung Co.	2,393,491	2,269,803	+ 5.4
Rochester City	2,849,243	3,584,193	-20.5
Monroe Co.	519,204	1,703,100	-69.5
Orleans Co. Genesee Co. Wyoming Co. Livingston Co.	2,138,311	2,166,573	- 1.3
Niagara Co.	3,299,413	3,263,842	+ 1.1
Erie Co.			
(Buffalo City)	6,572;132	7,537,148	-12.8
(Bal. of Erie)	6,162,178	5,982,476	+ 3.0
Chautauqua Co. Cattaraugus Co. Allegany Co.	3,123,520	3,461,348	- 9.8
Albany Co. Rensselaer Co. Schenectady Co.	3,869,347	5,343,195	-27.6
Greene Co. Columbia Co.	967,505	1,072,819	- 9.8

SDA	EST. 1984 JTPA	FY'83 CETA ALLOC.	PERCENT DIFFERENCE
Sullivan Co. Ulster Co.	1,734,054	2,333,185	-25.7
Suffolk Co.	8,372,005	12,280,359	-31.8
Nassau Co.	3,326,002	12,604,275	-73.6
Oswego Co. Onondaga Co.	4,613,228	6,122,326	-24.6
NYS TOTAL	155,831,770	210,854,818	-26.1

Mr. **Burton**. You said that the transition from the CETA to the JTPA program is proceeding at an uneven pace. Maybe you answered that earlier, but I wish you would answer it for my benefit. What do you mean by uneven pace?

Don't most transitional periods have some stops and starts and jerks like that?

Ms. **MacIlwaine**. We are not making that comment in a derogatory manner. I think we were indicating that we were aware of the fact that it is operating at an uneven pace. I do chair the National Association of Counties Employment Steering Committee. Several committee members are on councils from all over the country, and I hear from them periodically. What is going on in Ohio is a much different pace than what is going on in other States.

I am not sure that that is good or bad, but it is happening.

Mr. **Burton**. I see. That was just a statement of fact, and you don't have any suggestions on how to make it a smoother transition?

Ms. **MacIlwaine**. I guess all of us are a little concerned that the States are sort of another level. As I mentioned earlier, we are very concerned that some States have a gigantic buildup going on of staff to run these programs. Other States are relying heavily on the system that perhaps was in place before they took it over.

I am not sure how we are going to be measured when this is all finished. Is one State going to be measured against another? It could be a problem in how it is being implemented. It could be a problem in the fact that some States are worse off with their unemployment than other States.

I guess it all gets back to the performance standards. If everything is going to be uneven and we are going to end up with 50 different systems of JTPA, how are we going to be measured in order to not have us look bad when we are really not that bad. Local elected officials are really concerned about that.

Mr. **Burton**. Then the procedures and guidelines should have been more clearly defined at the inception of the program?

Ms. **MacIlwaine**. Yes. I think the performance standards should be more clearly defined and should reflect realistic outcomes. I realize that with the New Federalism we are trying to give the States all the power but I think there has to be some Federal guidelines that the States cannot just do their own thing. It is going to be very difficult for you to vote on reenactment of this act if you can't tell what is going on out there. I think that is going to be a serious problem.

Mr. **Burton**. Thank you, Mr. Chairman.

Mr. **Frank**. Thank you, Mr. Burton.

One of the points you make, Commissioner, is that you think it is appropriate for the Federal Government to look at the impact that actions will have on substate units.

There are those who say that the Federal role is satisfied when we turn things over to the States and that once we have achieved some rough equity among the various States that that is the end of it.

You don't think that is an adequate Federal role; is that right?

Ms. **MacIlwaine**. No; I don't think so. As I said, you have to decide whether this program is good or bad. I think they have kind of gone overboard. I know that a lot of times when we call our Federal office in Chicago or we call DOL about a question they refer us to the Governor.

The Governors have never run these programs before and so we are not getting the information, and as soon as they catch up with us, they will be able to help us.

But I think there is a Federal role. I really believe that.

Unemployment conditions are not caused by State-by-State conditions. A lot of it is based on the national economy. Therefore, the Federal Government has to play a stronger role in determining the performance of this program.

Mr. **Frank**. And you don't think that that would be unduly intrusive or restrictive of the flexibility you need?

Ms. **MacIlwaine**. I don't believe so. If they—DOL—could just perhaps recommend some standardization among the States, then I don't believe that would infringe. I think that it would help the States.

A lot of States are struggling right now. They have never done this before.

Mr. **Frank**. We should point out that the National Governors Association says, on this one, things very similar to what the counties are saying.

You also go beyond that on the information standpoint and suggest that there is some State decisionmaking that has been detrimental. You mentioned a Missouri State enactment that puts a 10-percent cap on local administrative costs where the statute says 15 percent.

Ms. **MacIlwaine**. Right.

Mr. **Frank**. Do they put a 10-percent cap on State administrative costs or just local?

Ms. **MacIlwaine**. Just locals. I am not sure about that, but I can tell you that it is—this is supposed to be a locally run program, partnership between the PIC and the local elected officials. If the States are going to impose that kind of a cap, which is not what the law or the Federal Government asked for in the regulations, then I think somebody needs to take a look at it and decide what to do.

It is really going to hurt the program there.

Mr. **Frank**. The only thing that it would seem to me could be done—I am not sure. Perhaps the Federal Government could, by regulation, prevent that, but my guess is that that would require a statutory change which you don't want us to do at this point, I take it?

Mr. **Smith**. It would just require the Department of Labor to enforce the conditions of the act itself.

Mr. **Frank**. You think that——

Ms. **MacIlwaine**. The act says the States cannot impose any more rules than the Federal Government requires, so this would be an enforcement of the act. I guess this gets back to my original concern that DOL answers everything by saying that it is up to the Governors.

If DOL doesn't do anything else, they should enforce the act.

Mr. **Frank**. Let me ask one last question.

This goes to the composition of the PIC's. It became clearer to me—particularly in the testimony on Tuesday—that the requirement that the PIC's have 51 percent business membership was not based on the notion that that is what it would take to get the varying sectors of the business community's expertise represented but was more of a political decision of reassuring them enough so that they would participate.

Are there difficulties from the standpoint of the local elected officials? That is another one of the tough decisions we have given you in this act. We say, "Here, this is what you have to do; you have to satisfy minority groups, women, Vietnam veterans, local community-based organizations, everybody else with 49 percent of the membership." Fifty-one percent then goes to the business community.

Are there problems in satisfying the various constituency groups that I think have a legitimate right to participate in this with that 51-percent requirement?

Ms. **MacIlwaine**. Well, let's say that we have to be very creative when we do it. I think, since there is no limit on the number of people who can be on a local PIC, that it has been our experience to do just fine.

Mr. **Frank**. It is the buddy system, then? You decide you need to represent another group, and they bring a business person along and they both join the PIC; is that right?

Ms. **MacIlwaine**. Yes.

Mr. **Frank**. An interesting way to broaden the horizons of the business community, I suspect.

Ms. **MacIlwaine**. Well, the businessmen are learning quickly that if they don't attend when decisions are made, they are made without them. It has been an interesting experience. I think it is healthy. I think the business leadership should participate very strongly in this, whether they actually have 51 percent or not.

Mr. **Frank**. Maybe after we get this thing worked out people will develop the kind of spirit where the exact number won't be as important as the participation.

Ms. **MacIlwaine**. Right.

Mr. **Frank**. So, from your perspective of the counties, you would like to urge the Labor Department to be a little more forthcoming with regard to its advice and counsel and suggestions and also to have OMB approve the Labor Department's April 26 proposal so we could get to work?

Ms. **MacIlwaine**. Yes. Good luck.

Mr. **Frank**. Thank you very much. We appreciate your coming. The hearing stands adjourned.

[Whereupon, at 11:15 a.m., the subcommittee adjourned, to reconvene subject to the call of the Chair.]

IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

TUESDAY, AUGUST 2, 1983

House of Representatives,
Manpower and Housing Subcommittee
of the Committee on Government Operations,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:30 a.m., in room 2247, Rayburn House Office Building, Hon. Barney Frank (chairman of the subcommittee) presiding.

Present: Representatives Barney Frank, Joe Kolter, and John R. McKernan, Jr.

Also present: Larry White, professional staff member; June D. Saxton, clerk; and Nancy Elwood, minority professional staff, Committee on Government Operations.

Mr. **Frank**. The hearing of the Subcommittee on Manpower and Housing of Government Operations will come to order.

We are here today to have what most of us hoped we would not have to have, which is the third hearing regarding the implementation of the regulations for the Job Training Partnership Act. In particular, we are here because the Office of Management and Budget rejected last week the proposals of the Department of Labor involving a reporting system and performance standards.

Mr. DeMuth, from the Office of Management and Budget, had agreed to testify. We had, at the request of the Office of Management and Budget at the last hearing, not included them. We had originally invited them. They replied that since OMB was at the time still considering its response, they would prefer to testify later. So, when their rejection came down, we agreed to reschedule it.

There was some difficulty in the scheduling and Mr. DeMuth was doing his best to accommodate us and apparently, in hurrying to accommodate us, got into a traffic accident this morning. It does not appear to be serious because the message is that Mr. DeMuth has been in an accident and will be late.

So with that, I think we will begin with our other witnesses and go to Mr. DeMuth when he arrives. As soon as he comes in, we will take him.

I should add that I was interested to learn in a telephone conversation with Mr. DeMuth that OMB did not consider this a decision, but rather, because they were running out of time, decided that they would issue a rejection so that they could then continue to consider a decision.

I am somewhat bemused by the notion of our management agency, whose purpose it is to cut paperwork and improve efficiency, not being able to meet its own deadline under the Paperwork Reduction Act, and thereby generating considerably more paper by a pro forma refusal and a continuation of this process.

I think the one clear message that the subcommittee received from everyone who testified last time—the business sector, the Governors, organized labor, the mayors, the people who are volunteering to work on this National Commission for Employment Policy—was that time really is important here. Everyone would like to be able to be geared up when startup time comes.

I don't want to prolong this. I only want to say that I think there is a near unanimous determination that such mistakes as were made in CETA—and I believe that people have exaggerated the mistakes that were made in CETA—people are determined not to repeat in the JTPA. I think, again, there was near-unanimous agreement on the regulations that the Department of Labor had proposed with regard to the critical questions of reporting and performance standards. Because they were proposed after serious conversations with the various groups involved, they, in fact, made it more likely that we would accomplish that goal.

So that is one reason why many of us are distressed the OMB has, even for pro forma reasons, rejected the proposal.

Let me just say that we are joined today by the ranking Republican member, Mr. McKernan from Maine, and also by one of our Democratic colleagues, Mr. Kolter from Pennsylvania.

Mr. McKernan, do you have a statement?

Mr. **McKernan**. No statement.

Mr. **Frank**. All right, why don't we begin, then, with Mr. Quinlan.

STATEMENT OF PIERCE QUINLAN, EXECUTIVE VICE PRESIDENT, NATIONAL ALLIANCE OF BUSINESS

Mr. **Quinlan**. Good morning, Mr. Chairman, members of the committee.

Mr. **Frank**. Mr. Quinlan, let me say to you and others that I appreciate your coming back. I want to make it clear that it was not the burning of those who are appearing today to testify again. They were very gracious; they gave the subcommittee the benefit of their advice; they were not looking to come back again, but I did feel that we are at a fairly critical point with regard to the JTPA and it was at my request that the three witnesses today appeared again to comment and I appreciate it.

Mr. **Quinlan**. Thank you, Mr. Chairman. I, too, had hoped it wouldn't be necessary to have the subcommittee convene again.

I want to take this opportunity to commend you and members of the subcommittee for your interest in the problem of finding the most effective data collection method to support the requirement in the act that the system at the State and local level meet certain performance standards.

I'll keep my remarks brief and defer to our previous testimony of July 12 about the substance of performance standards and the necessary data collection instruments developed by the Department.

We continue to believe that the proposed Labor Department system of reporting requirements is the necessary minimum for making performance standards the primary mechanism for accountability in JTPA programing and administration.

The Department's proposal, in our opinion, is not an overly prescriptive program for maintaining a uniform information system, and it is much more cost-efficient than any other option.

It is our understanding that options being considered by the Department still include an appeal of OMB's initial rejection of their proposal. We strongly encourage them to make such an appeal.

The Labor Department is also proceeding to develop other methods of gathering needed data such as a nationwide sampling of clients should the OMB decision prevail.

Our initial reaction to an alternative system based on sampling nationwide—again, without specifics as to how this would be done—is that such a method would cost the Federal Government much more, be less timely and be less consistent. Sampling would require DOL to sample individual client files in each SDA to collect the data and perhaps conduct client interviews if the definitions in the local management information system are not consistent with those being used in the sampling.

Also, since most sampling would have to be done using individual client files, this method could not measure the service delivery area's total cost-per-placement record. The law specifically requires that such a measure be developed and used in setting national performance standards.

We also know from BLS survey programs that the size of a national sample would depend on the amount of funds available to the Labor Department budget for the activity. If adequate funds are not provided, the sample would be so small that the data that is collected will be questionable.

The budget side of OMB has also been extremely tough in making funds available for such surveys. So there are questions about the availability of funds.

It would be far more practical and efficient to implement the Department's original proposal for data collection than to use the sampling technique. This approach can be incorporated now into the management information systems that are being set up to meet State reporting requirements.

Implementing the DOL proposal will only require minimal paperwork, which the State and local governments themselves have already testified will not be a burden. Unlike other options, the Department's original proposal will collect consistent data from the service delivery area level that can provide cost-per-placement information and other data elements to support the required standards, and support them in a much more reliable fashion than sampling could.

Any other method would probably involve individual client interviews to be able to assure that uniform definitions are used to aggregate and evaluate the data for national use. Every such survey that I have been involved in has been found to be an extremely expensive undertaking.

So where we stand right now is we don't have a closed mind in terms of alternative approaches, but basically, we haven't seen anything, and can't envision anything, that would be better than the Department's original proposal. We consider that the most reasonable and cost-effective option available.

That concludes my statement, Mr. Chairman.

[The prepared statement of Mr. Quinlan follows:]

TESTIMONY
Of
The National Alliance of Business
Before the
Subcommittee on Manpower and Housing
Of the
House Committee on Government Operations
On
Performance Standards and Data Collection Systems
Under the
Job Training Partnership Act

August 2, 1983

Mr. Chairman, I am Pierce A. Quinlan, Executive Vice President of the National Alliance of Business.

The Alliance is an independent, business-led, non-profit corporation whose mission is to increase private sector training and job opportunities for disadvantaged and unemployed persons through strong public/private partnerships. We have had nearly 15 years of experience helping unemployed youth and adults to obtain productive jobs in business and industry. Every Administration since NAB's founding in 1968 has turned to us to continue our lead in developing and maintaining business community commitment to train and employ the disadvantaged.

Mr. Chairman, I had hoped that it would not be necessary for the Subcommittee to convene again on this issue of a proposed reporting system for JTPA performance standards. However, I do want to take this opportunity to commend you for your continued interest in the problem of finding the most effective data collection method to support the requirement in the Act that the system — at the state, local service delivery area, and contractor levels — meet specific performance standards.

I will keep my prepared remarks brief, and defer to our previous testimony dated July 12 about the substance of the performance standards proposal and the necessary data collection instruments developed by the Department of Labor. We continue to believe that the proposed DOL system of reporting requirements is the necessary minimum for making performance standards the primary mechanism for accountability in JTPA program planning and administration. The Department's proposal is not an overly prescriptive program for maintaining a uniform information system, and it is much more cost-efficient than any other option.

It is our understanding that options being considered by the Department still include an appeal of OMB's initial rejection of their proposal. We would encourage them to make that appeal. DOL is also proceeding to develop other methods of gathering needed data such as a nationwide sampling of clients should the OMB decision prevail.

Our initial reaction to an alternative system based on nationwide sampling, without having the specifics on how it would be done, is that such a method would cost the federal government much more, be less timely, and be less consistent. The sampling would require DOL to sample individual client files in each SDA to collect the data, and perhaps conduct client interviews if the definitions in the local management information system are not consistent with those being used in the sampling.

Also, since most sampling would have to be done using individual client files, this method could not measure the service delivery area's total cost-per-placement record. The law specifically requires that such a measure be developed, and used, in setting national performance standards.

We know from the Bureau of Labor Statistics survey programs that the size of the national sample would depend on the amount of funds available in the Department of Labor budget for the activity. If adequate funds are not provided, the sample will be so small that the data that is collected will be questionable.

It would be far more practical and efficient to implement the Department's original proposal for data collection than to use the sampling technique. The DOL proposal can easily be incorporated now into the management information system that service delivery areas are likely to be required to set up to meet state reporting requirements. Implementing the DOL proposal would require only minimal paperwork which the states and local governments themselves have already testified will not be a burden.

Unlike any other options, the Department's original proposal will collect consistent data from the service delivery area level that can provide cost-per-placement information and other data elements to support the required standards in a manner much more reliable for evaluation purposes than sampling. Any other method would probably involve individual client interviews to be able to assure that uniform definitions are used to aggregate and evaluate the data for national use — a very expensive undertaking.

The National Alliance of Business together with the other key members of the partnership will be ready to review and analyze any major option developed by DOL if details become available. But, we want to emphasize that we strongly support the Department's original proposal as the most reasonable and effective option.

Mr. FRANK. Thank you.

Mr. McKernan.

Mr. McKERNAN. Thank you again for——

Mr. FRANK. Let me announce that Mr. DeMuth is here and he will go on right after Mr. Quinlan.

Mr. McKERNAN. Thank you again for returning, but I am really not sure what I ought to be asking—except whether you see any ways in which we can work out the differences between DOL and whatever OMB's problems are and what they consider to be over-reporting being required of the States.

Is there any way to work it out—I guess is what I am asking—other than an appeal? Are you aware of any specific problems that OMB has? The letter that we have a copy of doesn't really get into any specifics.

Mr. QUINLAN. I am not aware of specific problems. Again, as I mentioned in the last visit up here, I felt it was more a matter of a general concern about reducing paperwork and this being one of the few pieces of legislation that has passed the Congress and gone into implementation that embodies some of the principles that the administration was promoting—this got a lot more attention than perhaps another problem might have. So it becomes a test case.

That is only my presumption, not having any conversations with OMB.

Mr. McKERNAN. Since the last time you appeared, have any of your members, or any other States or local areas of government raised any additional concerns about the DOL performance standards?

Mr. QUINLAN. I have been on the road since the last visit, visiting with people at both the State and local level that are involved in the implementation process and I find no objections from those visits to the Labor Department proposal. The only concern that is expressed is that if we don't move quickly and have an understanding of what the requirements are, then you are going to have 50 or 580 separate requirements, which somewhat boggles my mind.

Mr. **McKernan**. I agree. Thank you.

No further questions.

Mr. **Frank**. Thank you.

Mr. Quinlan, you suggested that sampling could wind up costing more because it would require interviews. Is that correct?

Mr. **Quinlan**. Yes, sir. It is my feeling that localities are going to have to collect a lot—all of this information for their own management control purposes anyway, so it is not an added burden on them. But if you are going to go out and try to capture results using a sampling process, my experience in the past is that this has proved to be extremely expensive.

In this instance, I think it would be duplicative and unnecessary.

Mr. **Frank**. So, what you are saying is that the Labor Department's proposal basically called on the participating entities to report to the Labor Department data that they were going to be collecting anyway?

Mr. **Quinlan**. It is my judgment that that is absolutely essential data to be collected anyway.

Mr. **Frank**. So that the requirement for sampling would be the new requirement?

Mr. **Quinlan**. That is correct. It is—Mr. Chairman, it is similar, in my judgment, to a corporation saying to its subsidiaries, we want you to make a profit; we want to plan, but we don't want you to tell us what you are doing about implementing the results of our planning. That seems to be an unbusinesslike way to go about it.

Mr. **Frank**. One suggestion I have heard is that there was some concern at OMB with the participant characteristics that were being prescribed. Reporting had to be done on taking into account sex, age, educational status, race, ethnic group, employment barriers such as language limitations, being handicapped, unemployment insurance, et cetera.

Do you think that those ought to be required categories? Are those performance categories important for reporting?

Mr. **Quinlan**. One of the real concerns that I have about the job training partnership program, as contrasted with CETA, is that—with the pressure of performance standards, there could be a tendency on the part of people in trying to meet their performance standards to cream from the eligible population.

Ultimately, that could be one of the most critical issues and could be a death knell for the program if the program gets a reputation of creaming and not trying to serve the hardest to train and employ. We feel that capturing the characteristics and using the regression analysis is a way that you can even out results from location to location which eliminates the pressure to cream.

I was in a session with the Urban League yesterday in which some of the representatives there were suggesting that the way to show the best performance was to cream from the most qualified in the unemployed ranks. This is from the Urban League, which is a dedicated community-based organization with an outstanding reputation that provides various kinds of employment and training services under JTPA or previously under CETA.

It concerns me that an organization such as that—that is not an organizational position, but people who work for that organization at the local level—is thinking in that direction. That should be avoided at all cost, in my judgment.

Mr. Frank. Just two more questions. One of the things in Mr. DeMuth's letter to Deputy Assistant Secretary Bolden says that the States are not being given enough flexibility. It unduly limits the flexibility of States to adjust the performance standards of individual service delivery areas. Determining performance standards for each individual service delivery area would require States to follow precise methodology and use prescribed data in calculating performance standards.

We heard a lot of testimony last time that by the use of regression analysis and other means, a lot of effort had gone into trying to give the States flexibility. I am wondering what your response is to OMB's comment here that this is much too rigid for the States in the performance standards area?

Mr. Quinlan. Well, I would say that the process does allow the States to adjust according to their own conditions. Then I guess I would turn to the reaction of the States, who have always been very stringent on a question such as reporting. They saw no problem with the approach and it provided sufficient flexibility to meet their needs from the governor's standpoint.

Mr. Frank. One sentence in that OMB letter says:

> The degree of prescription in the DOL proposals is not consistent with permitting States to exercise wide latitude in tailoring performance standards to State and local conditions.

I guess my question is whether you think the person who wrote that sentence was familiar with what, in fact, had been going on in this area for the last couple of months?

Mr. Quinlan. I will make a presumption of familiarity. I just disagree with the statement.

Mr. Frank. OK.

My last question, the Paperwork Reduction Act of 1980, the conference report, and the regulations that were published a couple months ago are references to the duty of the Director of OMB to give the interested public a full chance to comment.

> OMB shall consider any public comments received and may provide the agency and interested persons additional opportunities to be heard or to submit statements in writing.

Have you been invited to comment by OMB? I assume not. Did you make an initial submission to OMB on the proposal?

Mr. Quinlan. We sent a letter to the Director of OMB on the June 1. At this point in time, we have not had any response.

Mr. Frank. I would have to say that I would be interested in knowing OMB's response to that point. Where all of the affected parties sent in comments—or so many of them sent in comments that were supportive—it would seem the proper spirit for the agency and interested persons to be given additional opportunities to be heard or submit statements in writing before rejection. This would have given you a chance to elaborate.

Mr. Quinlan, I appreciate your coming.

Mr. Kolter, any questions?

Mr. **Kolter**. Mr. Chairman, I have one question to Mr. Quinlan, and maybe to my colleagues here. Mr. Quinlan——

Mr. **Frank**. He has to answer; we don't.

Mr. **Kolter**. I missed the first meeting. This is the second meeting——

Mr. **Frank**. Yes, sir.

Mr. **Kolter**. You claim on page three that local governments and States have testified that implementation of the DOL proposal was not burdensome. Do we have supportive evidence of this? And, also, does that mean that States and local government approve this proposal?

Mr. **Quinlan**. Mr. Kolter, I think the answer is yes to both questions. The proposal has been developed over a substantial period of time in a very open process with representatives of State and local government, with representatives of organized labor, the business community and others, so you can say that this has been about as open a process in the development performance standards as one could possibly have.

Mr. **Frank**. I would add that at the previous hearing, representatives of the mayors and the governors spoke in behalf of the DOL proposal.

Mr. **Kolter**. Thank you, Mr. Chairman.

Mr. **Frank**. Thank you, Mr. Quinlan.

Mr. **Quinlan**. Thank you, Mr. Chairman.

Mr. **Frank**. We will now hear from Mr. DeMuth.

Thank you, for coming. We are sorry for your troubles in getting here this morning. We got the message.

STATEMENT OF CHRISTOPHER C. DeMUTH, ADMINISTRATOR, OFFICE OF INFORMATION AND REGULATORY AFFAIRS, OFFICE OF MANAGEMENT AND BUDGET

Mr. **DeMuth**. Mr. Chairman, as you know, several days ago, OMB turned down the Labor Department's Job Training Partnership Act notice pursuant to our information collection and statistical policy oversight responsibilities under the Paperwork Reduction Act.

Mr. **Frank**. If you will excuse me, Mr. DeMuth, if there is no objection from the members of the committee, we will put into the record a copy of the letter from Mr. DeMuth to Ms. Bolden on that point.

Mr. **DeMuth**. Thank you.

[The letter follows:]

JUL 1 9 1983

Ms. Betty Bolden
Deputy Assistant Secretary for
 Administration and Management
Department of Labor
Washington, D. C. 20210

Dear Ms. Bolden:

After careful review and full discussion of the issues with Department of Labor representatives, we are disapproving the proposed information collection requirement under the Job Training Partnership Act (JTPA), which was submitted to the Office of Management and Budget April 20, 1983 for clearance under the Paperwork Reduction Act. We have also determined that the submission is inconsistent with E.O. 12291.

Disapproval under the Paperwork Reduction Act is due to the universal nature of reporting required of states, as contained in the submission, which goes beyond what is necessary for the federal government to meet its responsibilities under JTPA. Mandated universal reporting is an unnecessary feature of the proposal since sampling can be effectively utilized to measure performance.

The regulation is inconsistent with E.O. 12291 in that the contemplated approach of determining performance standards for each individual service delivery area would require states to follow a precise methodology and use prescribed data in calculating performance standards. Also, it unduly limits the flexibility of states to adjust these standards for individual service delivery areas. The degree of prescription is not consistent with permitting states to exercise wide latitude in tailoring performance standards to state and local conditions, and is incompatible with the concept of a federal-state partnership as envisioned by the JTPA.

An approach using less prescriptive performance standards, along with sampling, to measure performance should be developed to be consistent with both the Paperwork Reduction Act and E.O. 12291. Under such a scheme, states would be free to choose an approach for their service delivery areas using performance standards similar to those Labor already proposed. We remain willing to consider and discuss this, or any other approach Labor may wish to propose that is consistent with less prescriptive performance standards and which utilizes sampling to measure levels of performance.

Sincerely,

Christopher DeMuth
Administrator for Information
 and Regulatory Affairs

Mr. **Frank**. Please proceed.

Mr. **DeMuth**. I want to emphasize that there is no disagreement between OMB and the Labor Department on the goals of the Job Training Partnership Act performance standards. The point is to insure that the goals of the act are being met, and in particular, that the administration of the act incorporates incentives for better performance at the service delivery area level.

The questions that we have are matters of method rather than goals. The notice that the Labor Department published envisions collecting universal, nationwide program information. The data would be collected of all program participants, approximately 1 million a year, aggregated at the service delivery area level, and reported to the Department of Labor. The Department would feed this SDA aggregate data into a regression model in an attempt to explain the variables that affect performance, performance in terms of placement rates, reduced welfare dependency, cost-effectiveness in terms of the cost of training versus the increased wages of people who had gone through the program. It would attempt to explain performance in terms of several—12 variables that the Department has selected, based in large part upon CETA experience.

The results of these regression runs would be used to establish weights that would dictate exact performance standards for each service delivery area. For example, if the basic performance standard was an entered employment—or placement—rate of a certain amount, and the regression model found that a higher number of women being served resulted on average in higher placement rates or a high number of older people being served resulted on average in lower placement rates, each SDA's job-placement performance standard would be varied according to the weights that came out of the model.

The results would be used to assess the performance of the program on a national level, and it would also be used by the Governors, either to provide monetary incentives in distributing their 6 percent discretionary incentive funds to the SDA's within their State, or on the other hand, to impose certain sanctions such as reorganizations on individual SDA's.

Under the Labor Department's proposal, the performance standards, as set nationally and adjusted according to the results of the regression model, would in many regards be highly prescriptive on the Governors. For example, the notice says that to receive any of the 6 percent performance incentive funding from Governors, an SDA would have to meet or exceed five of the seven performance standards, and three of those five would be prescribed by the Labor Department itself.

OMB's difficulties, which we are meeting with the Labor Department to discuss even today, and which we anticipate we will be able to resolve in the near future, focus on two related aspects of this proposal. These are, first, the universal nature of the collection, and, second, the mandatory nature of the use of the results of the regression model.

Let me address the second first. We are concerned that we have here a data collection and regression model that is too ambitious in the sense that it assumes that we know much more about the determinants of successful job placement than, in fact, we do.

We are concerned that the regression model that has been prepared does not account for a good deal of the real world variability in success or failure in placing people in lasting jobs, getting them off welfare rolls and so forth. For this reason, mandatory performance standards based upon the model could have highly inequitable results, setting a performance standard for one area that was actually unfairly high or low relative to other areas.

We have not seen the regression model. We do not know what all of the assumptions are. We do believe that the factors that are important in determining success in these programs are greater than 12. A statistician would want to know what the model's "R-squares" are—what are the magnitudes of variations in performance across SDA's that cannot be accounted for by the 12 independent variables.

If, as we suspect, a large amount of variation cannot be accounted for by the independent variables we fear that the regression model approach will lead to differences in performance standards among service delivery areas that are substantially random.

Now, we don't know that. We think this is a legitimate cause for concern. The statisticians at OMB have a number of technical issues that they wish to have resolved. We think it is a serious issue and that we should not go forward with this grand national reporting program based upon a regression model that has not been more thoroughly examined than this one has at this point.

Given what we know about the model, and given what we know about models in general and what they can explain and what they leave uncertain, we believe it would be better that the results of these regressions be made available to the Governors to be used by them as provided in the act—to vary performance standards within their State at their discretion—but that the Federal Government should not be establishing differential performance standards for all of the service delivery areas in the country which would be mandatory on the States as a result of this certainly imperfect, regression model.

We believe, second, that it is not necessary for all of the data collected to be universal. In some cases, it may be appropriate. For example, where data is being collected on a universal detailed basis in any event—such as cost of training, and some of the trainee characteristics—there is no substantial additional burden in collecting such data universally for evaluation and standard setting.

But in other respects, we believe that sampling would provide more accurate information at less cost. As an example, of that, I am not certain of this, but I believe that one of the technical problems raised by the governors has been the collection of wage data for only 13 weeks as opposed to some longer period after a trainee has completed the program.

Now, given that following up for 13 or 26 weeks is an extremely costly aspect of universal reporting under this proposal, it might be better to do sampling in the case of wage histories, but within that sample to collect data for a longer period of time than 13 weeks. This could give us more accurate information and would be less likely to produce skewed incentives for the managers of the training program at the local level.

There are many other policy areas where funding and related decisions are based on sampling rather than universal reporting. This is not a new issue, and we think there are substantial opportunities for improving the efficiency of a national data collection through sampling. We think that that would be fully adequate for meeting the Federal Government's responsibility for general national program assessment.

We think that sampling would be also equally adequate, for establishing performance standards. Given the uncertainties we have about the regression model itself, any reduced information from sampling—if there was any at all—would probably be swamped by the uncertainties that are already a part of the regression model.

Our current view, subject to further explanation with officials at the Labor Department, is that given the uncertainties over the results of the regression model, the model should not be used to prescribe exact variations in performance standards at the national level, but instead should be made available to the Governors for their use in varying standards within their States, along with blunt descriptions, not only of what the regressions explain but what they fail to explain.

Thank you.

Mr. **Frank**. Thank you.

Mr. McKernan.

Mr. **McKernan**. Mr. DeMuth, you said that you are in the midst of working these out with the Department of Labor? How long do you think it is going to take for an agreement?

Mr. **DeMuth**. I hope we can do it in a few weeks. I am aiming for a lot shorter than that. We are working with them on it today, and we will be working on it tomorrow. It is a top priority.

Mr. **McKernan**. By a matter of weeks, do you mean end of the summer; is that what you are talking about?

Mr. **DeMuth**. Oh, sure.

I should say, as my comments indicated, that there are some imponderables. It could be that some kind of redesign that we would find mutually satisfactory might take a while to put in place and publish after the general approach was nailed down. If we work this out this afternoon, it doesn't mean that we will be in the Federal Register tomorrow morning. Exactly what the lag time might be is difficult to predict at this point.

Our statutory deadline is the end of next January. There is no question that the States would like to have some clear signals on this important aspect of the program a lot earlier than that and we intend to do that.

Mr. **McKernan**. You seem to be concerned about an issue that nobody involved in the program is concerned about on the way this data is collected. It is almost as though you are saying that you really shouldn't have to have that burden, even though you don't mind having it.

You don't see that it might be beneficial to just allow this data collection to begin in a way that all the participants seem to feel is appropriate, and maybe change how that data is analyzed, but at least let those people who seem to be willing to provide the data provide it?

Mr. DEMUTH. Well, let me say in general that it is not unusual, under the Paperwork Reduction Act, for OMB to object to surveys that the people being surveyed want to have happen. When the Commerce Department wants to survey businesses to put together a case for import tariffs or quotas, the businesses are quite happy to bear that burden. A lot of agricultural marketing surveys are strongly supported by farmers. Frequently, people want to have the Federal Government collect data for them rather them doing it themselves, both private groups and State governments. So while I agree that respondent opinion is an important consideration, I do not think it is decisive, especially in a case like this where OMB's statistical policy responsibilities are involved.

Our primary concern here is that we are going to be collecting a lot of data, running it through some very complex regressions, the nature of which we have not been fully apprised of at this point, and that the results may be inadequate, may not justify the costs imposed—whoever bore those costs—and may produce some essentially inequitable and arbitrary results.

Now we don't know for centain that this is the case, but I think that labor economists know enough about what appears to work and what is simply unknown about job training programs in the past to be concerned over a single, nationwide regression model, which is going to be vouchsafed by the Federal Government as the answer to what works and what doesn't work, and which is then going to be used to set precise performance standards for every service delivery area in the Nation.

Most of the labor economists and statisticians I have talked to have sincere concerns that a lot of the variability in performance is just not going to be accounted for in these regressions. If everybody is pleading to have this burden imposed upon them, that is one thing, but if under our statistical policy responsibilities, we think that the results are going to be statistically weak, we have a responsibility for making an independent judgment.

To tell you the truth, we cannot make that judgment until we see what the bases are for the regression model that they have put together. That is one thing that we have got to examine.

Mr. MCKERNAN. All right. Have you given any thought to leaving in place what you refer to as the universal collection of data—and just tinkering with the way in which the regression analysis is going to take place; how that is going to be done at the Federal level; and how the results are going to be used?

Mr. DEMUTH. Well, we have given some thought to it. As I have indicated, universal collections make more sense in some cases than others. When you get into such things as postemployment wage histories, where the DOL proposed, would collect a lot of data covering a fairly short period of time, there are very sound grounds for thinking that small national samples covering longer periods would be a more artful way to assemble accurate national information.

There are obvious tradeoffs, but collecting data for a short period of time for most everybody is an extreme. We ought to be examining alternatives.

Now, you say what we are going to do with the data, it is our—it is our view right now that given the inherent limitations of whatever kind of a regression model that might be employed at the national level, however well perfected, there will still be so much variance from area to area which cannot be captured by any national model, that rather than being prescriptive on the States, the model ought to be made advisory.

We ought to give this information to the Governors, to the State agencies, to the local agencies and this isn't an area where people would be inclined to ignore such information. To the extent that this knowledge is helpful to them, I think they will use it. But we ought to explain in each case that average national data may not be appropriate for Maine or Texas or Kansas or Rhode Island.

There are differences among the States, and I think that rather than trying to subsume all of those differences into some grand model at the national level, we ought to leave a little bit of discretion to the States. I don't see any reason to suspect that they wouldn't be adequate to the task.

Mr. McKERNAN. I guess I don't understand how the national performance standards would work, then, if all of the results of the analyses were going to be discretionary with the States, to either change their program or not.

Mr. DEMUTH. I am sorry, sir?

Mr. McKERNAN. It seems that what you are saying is that the States will take care of making sure that there is adequate performance in their programs, and therefore, we are not going to have performance standards by just giving them the information and making it discretionary.

Mr. DEMUTH. No, we would set national performance standards. This regression model is for the purposes of establishing weights to vary the standards at the SDA level according to particular circumstances.

The example I gave is if, for example, a large proportion of the individuals being served were women, or were people in certain age groups.

Mr. McKERNAN. OK.

Mr. DEMUTH. That might not take account of certain variabilities. The age group factor on a nationwide basis might apply very differently between service delivery areas in Chicago and St. Petersburg, Fla., for example.

Mr. McKERNAN. How are you going to take into consideration the variables in the SDA's and different parts of the country in the national performance standards that you are talking about?

Mr. DEMUTH. The scheme that is set forth in the statute is that DOL establishes performance standards and parameters within which these standards may be varied by the Governors. The Labor Department proposal would set the national standards first by setting a national figure and then by varying them through the weighting system. Initial weights were actually published in the notice, but subsequently the weighting system would be based upon the results of the regressions.

So there would be variations from one service delivery area to the next that would be prescribed nationally. Then the Governors, based upon specified local situations, would be able to vary those within the States within certain parameters.

Our current view is that given the uncertainties in the model used for weighting for performance standards can be reduced but not eliminated. There is to much that we do not understand about the determinants of success in job training. We do know some things. For example we know that if the female population being served is larger than average, by a certain amount, then the success of the program will be better than average by a certain amount. This knowledge might be used to set tougher standards in certain circumstances where the population was disproportionately female.

If we give such information to the States, I think in many cases they will use it. But setting the variations at a national level based upon this model and then locking the Governors into the standards to a great extent, is overambitious. It assumes that we know too much—it assumes that we know a lot that we do not know at the national level and it takes too much responsibility on the Federal Government for making the decisions which people at the local level will be much more informed about.

A regression model can be helpful. Our difficulty is making it definitive and mandatory.

Mr. McKERNAN. I have no further questions.

Mr. FRANK. Mr. DeMuth, has OMB received comments from the public?

Mr. DEMUTH. Numerous.

Mr. FRANK. How many Governors have objected to the standards?

Mr. DEMUTH. A very large number. I don't know the exact number, but a very substantial number have written——

Mr. FRANK. Governors have written in and objected to the DOL?

Mr. DEMUTH. I don't know the exact number—no, no, no, have——

Mr. FRANK. Governors of States, how many have written in and said to you, "Save me from DOL; they are oppressing me"? Or a variant thereof.

Mr. DEMUTH. No, none. It is mostly——

Mr. FRANK. No Governors have written in to object to these standards?

Mr. DEMUTH. I believe that there have—a few Governors have written in objecting to technical aspects, but I don't believe that any of the criticisms go so far as the concerns I have expressed.

Mr. FRANK. So no Governors and no mayors have objected to the proposal?

Mr. DEMUTH. Well, I don't want to—if you will forgive me, I haven't gone through all of the comments that have come in. I can check with that and get back to you.

Mr. FRANK. I would appreciate it.

[The information follows:]

COMMENTS FROM STATE OFFICIALS RECEIVED BY OMB

OMB received 14 letters from State officials commenting on Labor's proposal. Eleven of these letters were supportive of the proposal and three expressed some concerns.

Mr. FRANK. My guess is that it doesn't sound like any Governors raise this objection.

There is a second procedural point. My understanding, from the testimony we have heard and other things is that the Labor Department spent considerable time talking with the Governors, the mayors, the AFL-CIO, the National Alliance of Business, and Private Industry Councils to come up with something that was mutually acceptable.

You now tell me that what will happen is that you and the Labor Department will go off by yourselves and renegotiate this with no chance for input from all of these other people. That is distressing. How will they have input?

Mr. **DEMUTH**. I don't understand. You seem to contradict what you just said. We have had voluminous input.

Mr. **FRANK**. No, there was a process back and forth discussion on the proposal. Let me take this in two points. First, the involved groups testified here 2 weeks ago, National Alliance of Business, the mayors, the Governors, the AFL-CIO, the Private Industry Councils, and the National Commission for Employment Policy. None of them were satisfied with the communication that they had exchanged with OMB because it had been a one-way street. They had sent in one set of comments; they have gotten no response; no chance to respond to what the questions were; no chance to respond to the kinds of questions you are raising now.

There was a lot of speculation, a lot of inference, a lot of hypothesis about what OMB's concerns were. I don't call that a lot of input. What they had, it seems to me, was a much more satisfactory relationship with the Labor Department where they were able to talk and go back and forth and work out some things that they could agree on.

The problem now is that you and the Labor Department are going to negotiate and they don't have further chance to participate and react as they did with the Labor Department.

Mr. **DEMUTH**. Well——

Mr. **FRANK**. What is the role of the States and the various private entities from now on?

Mr. **DEMUTH**. I would assume that whatever we came up with, if it were anything different from exactly what we have now, would be made available for further comments.

Our role is oversight and, in most cases, meetings with affected private, non-Federal groups are done at the agencies.

Mr. **FRANK**. I understand that. What I am saying is that in this case, the agency, having done all that, and these groups, including the local and State governments, having worked out something that they all thought was pretty good, now find you and the agency going off renegotiating the product. They don't have the same chance to participate; they don't have a chance to react.

Now you say, well, they will just await your decision. What happens now? Are you going to publish it and then they set up another comment period?

Mr. **DEMUTH**. I think that would be appropriate. But let me just say——

Mr. **FRANK**. What is our timetable? It is getting close to January——

Mr. **DEMUTH** [continuing]. About negotiations——

Mr. **Frank**. Take me through the timetable. You are going to come up with something in a few weeks—maybe we are talking now about middle to late August. You say there may be some drafting problems, in terms of where we are.

Mr. **DeMuth**. Yes.

Mr. **Frank**. So we are publishing something in the Register around early September, and there is a 60-day or a 30-day comment period, and then you get more comments? We are getting pretty close to the time at which these people are supposed to be in actual operation.

In the name of decreasing paperwork, you are increasing uncertainty and delay. Was there any reason why some of these decisions couldn't have been made between April 26 and July 26?

Mr. **DeMuth**. Many of them were.

Mr. **Frank**. Yes; but since many of them were not, that is an irrelevant answer. I mean, it didn't help anybody that many decisions were made earlier because people still don't know what they were or where they stood.

Mr. **DeMuth**. Right.

Mr. **Frank**. There comes a point at which decisions just have to be made in order for people to be able to cope with these things.

Mr. **DeMuth**. Right. I don't disagree with you at all. The question is, when you are putting in place a large new system that is going to affect millions of people for many years into the future, that is going to affect the kind of information that we have on how this new training program is operating, and the administration of the program, itself, whether a little bit more time up front might not pay off.

It seems to me that at some point people ought to get into the substance. Is it really everybody's position that this regression model is going to explain so much of the variability in performance that we can use it to set national standards for every service delivery area in the country and not have any qualms at all about being quite inequitable?

Mr. **Frank**. Have you gone into that with the people involved? It doesn't seem to me that you have. Have you talked or has anybody from OMB talked with the National Alliance of Business or the Governors to say what do you think about this?

I don't think they have been given a chance to respond to the kinds of things you have said. I think this may be for many of them the first time they are hearing them. They are certainly not in the letter in any great detail. They are reasonable considerations, but there are procedural problems here.

The purpose of the Paperwork Reduction Act is to make things work better, not to slow them down. I mean, nobody is saying that they shouldn't be involved in the decisions.

Mr. **DeMuth**. No, I think——

Mr. **Frank**. But having them delayed for several months, and having the people who are directly involved not really be given a chance to respond and participate, I think, is a problem.

Without this hearing, I don't know how some of these people involved would have had a chance to hear what your questions were?

I think for many of the people who are directly involved in this, your statements today are the first time they have had a chance to hear any of it.

Mr. **DeMuth**. Well, we have been making them to our colleagues in the Labor Department for several months.

Mr. **Frank**. I understand that, but what about those involved? I mean, have you no responsibility to communicate your views and to get reaction from the National Alliance of Business the Governors, the AFL-CIO, or the mayors?

I mean, it seems to me the process is flawed in that regard. The Paperwork Act suggests that you do.

Mr. **DeMuth**. I can't guarantee to you that nobody in the Labor Department has discussed these issues with any of the private groups.

Mr. **Frank**. No; and I wouldn't ask you to guarantee——

Mr. **DeMuth**. And it would surprise me if they——

Mr. **Frank**. I wouldn't ask you to guarantee what the Labor Department did, but what I am saying is that it seems to me OMB is not living up to the spirit of some of these quotes from the Paperwork Act in dealing with making the effort. You are making the decision, not just the Labor Department.

I don't think you can delegate the Labor Department as spokesman. You could delegate to the Labor Department the function of talking to these people if you were delegating to the Labor Department the decisionmaking process. But where you are—as you have a statutory right to do—making a major part of the decision, I don't think it is adequate for you not to have dealt with people. It is inappropriate for them not to understand what your concerns are.

You say, "Should we get into the substance?" I wish they had a chance to do that. I think it is very important for them to be able to respond to some of the questions that you are raising here.

What bothers me is that the process appears not to give them a chance to do that. Do you have any plans or are you intending to talk to these groups as you make your decision over the next few weeks at OMB?

Mr. **DeMuth**. I would meet with anybody who asked me. Nobody has.

Mr. **Frank**. So then you would be prepared to listen, if they wanted to sit down and respond. It didn't seem that way when they wrote comments in. Did you respond anywhere to the comments that solicited further comments than what your concerns were?

Mr. **DeMuth**. No.

Mr. **Frank**. That does not seem to me to be a very useful way of proceeding. Despite the delay now, you say we have time to respond that extends to the end of January. It looks like we are talking about a timetable which means things won't be final until well into the fall.

If you are not going to be publishing anything until September and there is a comment period—we are talking about people maybe not knowing well into October, even November. Is that not a problem? The people involved in running the program seem to think it is.

Mr. **DeMuth**. Well, we will do our best.

Mr. **Frank**. Are you understaffed? You know, this didn't sneak up on you since April 26. I really don't understand why the delay. There are some difficult decisions, but at some point, somebody has got to make them. And if people can't agree, then I guess there has got to be an umpire somewhere in the administration. If you and Labor can never come to an agreement; if it has got to be appealed, then do so. I just think that there has not been adequate concern shown for the other partners. In the name of helping these participants, I think you are burdening them by the process. They certainly feel that way.

I think the notion of sampling on the followup situation, rather than a 6-month or 3-month followup reporting requirement is the kind of reasonable idea people would like a chance to talk about.

Let me ask a question, though, on the regression analysis, Understanding the difficulties with any model like that, the problem I have is that the alternative is no uniform system at all. What does that do to comparability?

If the national regression model is only a suggestion, the States can act on it or not. And if the States then go off in very different directions, we have a problem What people have suggested is that that would make it difficult to compare the various success rates and the various data.

Different States will be giving much different weights to things with no national uniformity.

Mr. **DeMuth**. Well, that is in setting the performance standards with the weights coming out of it. I don't know that it interferes with the ability to make comparisons in results across States. We will know what the placement rate has been across two States. The question is, what do you do with the information?

Mr. **Frank**. Would you use the national model? Would you advise Congress or the executive branch to use that regression model in evaluating the different State results?

Mr. **DeMuth**. We are going to have to see that model before we know.

Mr. **Frank**. The—the Labor Department hasn't shown you the model yet? Do they have it?

Mr. **DeMuth**. We are told that they do.

Mr. **Frank**. Who are you told that by?

Mr. **DeMuth**. By individuals from the Labor Department.

Mr. **Frank**. So the Labor Department says, we have the model?

Mr. **DeMuth**. Yes.

Mr. **Frank**. When did you first ask to see it?

Mr. **DeMuth**. I don't know the—I can't give you the date, sir.

Mr. **Frank**. I mean, are they refusing? I am puzzled. It does sound a little bit strange that there is a problem with the Labor Department refusing to show you their model. I mean, do you need a subpoena? Do we get Don Albosta to help you? This is not the way the Federal Government ought to do business where an important decision isn't being made because the Labor Department won't show you their model.

I mean, have they promised to show it to you now? Is there a date certain by which they will reveal the model?

Mr. **DeMuth**. We have received a brief and very simple account of the model in general and that is all we have seen so far.

Mr. Frank. Well, obviously, and I respect the seriousness of your concerns, if you haven't even seen the model yet, we are not on the verge of any decision. I say quite obviously, because I assume that you are then going to have statisticians, labor economists, and people in whose expertise you have faith look at the model and give it some analysis.

So we are talking about a fairly—a much longer period than seems reasonable to me. Why is that? Have you asked them to see the model before this and they wouldn't show it?

Mr. DeMuth. Yes, sir.

Mr. Frank. Did they say why they wouldn't show it to you?

Mr. DeMuth. Well, what we—we have gotten some documents, but they do not——

Mr. Frank. Did you have to turn them down because they wouldn't show you the model? Are you saying that you had to turn them down as a way of getting them to show you the model?

Mr. DeMuth. We have some questions about the model that we have got to explore with them.

Mr. Frank. I understand that. Did you ask them for the model before you turned them down and they refused to show it to you?

Mr. DeMuth. Yes.

Mr. Frank. I am baffled. [Laughter.]

So, the turndown is a way to get the Labor Department to show you the model? Did Mr. Stockman call Mr. Donovan and say, "Can I see your model?" and Mr. Donovan said, "Nyah-Nyah?" [Laughter.]

This is not the way adults ought to behave. Did you explain to them that you couldn't approve this unless you saw the model? I don't think you are being unreasonable when you ask to see the model. I don't understand why they wouldn't show it to you.

My understanding is that they have shown it to some of the other groups. Maybe if you talked to the National Alliance of Business, they would have told you about the model. [Laughter.]

I am not going to pursue it further except to say that I feel the process really seems to be sadly deficient. I am obviously not an expert in regression analysis and I guess the most expert we get in statistics are in the more simpler polling questions. But the procedures that the Labor Department and OMB are following with regard to each other in this case are inadequate. For the Labor Department to refuse to show OMB its model, and for us to be facing the kind of delay that we are facing of at least a couple of months, seems inexcusable. It may be longer before we can get the thing on track. It almost sounds as if things didn't get serious until there was a first turndown. That is hardly the spirit of the Paperwork Reduction Act.

I also would hope that you would be talking to the groups. My own sense is that it would be wise at this point for you to make a decision fairly quickly while talking to them. And obviously experience is, in my judgment, going to be one of the major factors that is going to decide when and how we change it. That is the last thing I would say. Obviously, if you ask, shouldn't we do the best we can at the front end? Of course, we should. We should also recognize that for many of the reasons you talk about, experience is going to have a lot to do in what we do here, too.

But I think some of the hopes we have had for the JTPA getting off aren't well served by this kind of process.

Mr. **DeMuth**. Just for the record, let me make it clear that I have not said that nobody has been meeting with any groups from the outside.

Mr. **Frank**. No; they have said that.

Mr. **DeMuth**. We have an intergovernmental relations staff and so forth.

Mr. **Frank**. They have said that. Let me say for the record, I asked all the groups. They all told me that they had sent a letter to OMB, a set of comments, and had no further discussions with OMB after that. The problem is that the process now does not appear to have a role for them.

I also would ask you to submit for the record a breakdown of the comments. I would specifically like to know whether any of the private industry councils, any of the Governors, any of the mayors or any of the other groups represented, even if it is the National Alliance of Business or AFL-CIO locals, share your objection to the Labor Department's proposals and the lines that you have talked about.

It is a little strange when they are all on that one side for upholding the proposal.

[The information follows:]

COMMENTERS ON THE LABOR DEPARTMENT PROPOSAL

Expressing concerns with the proposal:

1. Judith Meierhenry
   Secretary
   Department of Labor
   State of South Dakota

2. James R. Thompson
   Governor of Illinois

3. Douglas X. Patino
   Director
   Arizona Department of Economic Security

Expressing support for the proposal:

1. Kenneth M. Smith
   Chairman
   National Commission for Employment Policy

2. Richard D. Lamm
   Governor of Colorado

3. William H. Kolberg
   President
   National Alliance of Business

4. John Carlin
   Governor of Kansas

5. Robert D. Orr
   Governor of Indiana

6. Pierre S. duPont IV
   Governor of Delaware
   Chairman
   Subcommittee on Employment and Training
   National Governors' Association

7. Judy Rhodes
   State Liason for JTPA
   State of Mississippi

8. Catherine N. Stratton
   Associate Secretary of Economic Affairs
   Commonwealth of Massachusetts

9. Edward J. Stanek
Director
Office for Planning and Programming
State of Iowa

10. Lamar Alexander
Governor of Tennessee

11. Scott M. Matheson
Governor of Utah

12. Mathew B. Coffey
Executive Director
National Association of Counties

13. Congressman James M. Jeffords

14. Senator Dan Quayle

15. Christopher S. Bond
Governor of Missouri

16. Lane Kirkland
President
AFL-CIO

17. James B. Hunt, Jr.
Governor of North Carolina

18. Congressmen Frank, Levine, Owens, Kolter, Erdreich, Spratt and McKernan (joint comment)

19. Senators Kennedy and Metzenbaum (joint comment)*

*Received after the hearing

Mr. Frank. Yes, Mr. McKernan.

Mr. McKernan. I just wanted to follow up on the next to the last point.

Mr. DeMuth, there was a lot of sort of nodding and mumbling as you were asked about your request to see the actual model of the Department of Labor. I would just like to ask you, I guess, for the record, did you ask to see the Department of Labor's model?

Mr. DeMuth. I will give you a formal detailed answer on that. There have been innumerable staff meetings on this subject over the past months or so that I have not been at. I can't give you a definitive answer as to exactly what words were said between people at those meetings, but I will do that if you wish.

Mr. McKernan. I would appreciate that. I would like to know when you asked to see the model and when it was, in fact, when that request was turned down. I would also like to ask you just here for the record, if you know the answer, was this letter to Ms. Bolden based on the fact that you could not see the model and therefore didn't know whether or not it was a proper analysis?

Mr. DeMuth. No, I did not say that. Let me make that clear.

As I said at the beginning, we have some reservations about the entire scheme that are heightened by our concerns about the particular regression model.

Mr. McKernan. But all you have received is a summary of what that model is going to be?

Mr. DeMuth. Yes. But going beyond that, it seems to us likely that there are important variables that no model can explain and that, therefore, there is a possibility that any such model is going to leave unexplained a substantial part of the variability in what could reasonably be expected of the performance of a given SDA. This is a concern which affects, for example, the question whether it should be mandatory or simply made available to the States and which, goes beyond particulars of the model itself.

Mr. McKernan. That is what I was going to say. It almost makes the model itself irrelevant because it is a larger concern than that.

Mr. DeMuth. It is a larger concern, but the importance of it would depend upon details of the model.

Mr. McKernan. OK. Well, if we could just have a little more in-depth answer on exactly what the relationship was between the Department of Labor and OMB as it related to the model, and your access to that model, and then what role the model itself played in your decision to reject a particular aspect of the standards.

Mr. DeMuth. Certainly.

[The information follows:]

Submission of Regression Model to OMB

On June 3, Department of Labor staff discussed their regression model with OMB staff. OMB asked that the Labor Department furnish additional information about its proposal including an explanation of the model for analyzing statistical relationships between performance measures and local factors. On June 21 Labor submitted a brief explanation of the model. The model and its statistical output was submitted to OMB on August 3.

NINETY-EIGHTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON GOVERNMENT OPERATIONS

2157 Rayburn House Office Building

Washington, D.C. 20515

August 10, 1983

Mr. Christopher DeMuth
Administrator, Office of Information
and Regulatory Affairs
Office of Management and Budget
Executive Office Building
Washington, D.C. 20503

Dear Mr. DeMuth:

I am writing to follow up on the Manpower and Housing Subcommittee's August 2nd hearing concerning OMB's rejection of the Department of Labor's proposed Job Training Partnership Act performance standards and reporting requirements.

As you recall, at one point during the hearing, you stated that no one at the Office of Management and Budget saw the Department of Labor's actual model which was constructed for the purpose of determining local performance standards. Instead, you said that OMB had only received descriptions of the model from the Department. As I mentioned during the hearing, I am most interested in knowing just what sort of impact you believe this failure to review the actual model may have played in OMB's decision to reject the Department's J.T.P.A. proposals. I would appreciate your shedding some light on this issue at your earliest convenience, as we are leaving the hearing record open until we have received your response.

In addition to your addressing the foregoing question, I would also appreciate your clarifying one other question which arose during the hearing. With regard to the performance standards proposed by the Department, is OMB's position that there should be no such national standards, or merely that the Department's use of regression analysis in establishing the standards should be rejected or altered? I do not think the hearing record is adequately clear on this question, and a written response from you would resolve this ambiguity.

Thank you for your assistance in this matter, and I look forward to hearing from you.

Very truly yours,

John R. McKernan, Jr.
Ranking Minority Member
Subcommittee on Manpower & Housing

Mr. **McKernan**. Thank you.

Mr. **Frank**. Thank you, Mr. DeMuth. If members of the staff with you could stay behind, we are going to have some further discussion of this from the Governors and the AFL-CIO who are going to testify. If there is a member of your staff who would be around to listen to it, I think that might be helpful.

Mr. **DeMuth**. Thank you.

Mr. **Frank**. We will hear next from Carol Amato, who is the executive director of the Governors' Employment and Training Division in Richmond. She is going to testify on behalf of the National Governors' Association.

STATEMENT OF CAROL AMATO, EXECUTIVE DIRECTOR, GOVERNORS' EMPLOYMENT AND TRAINING COUNCIL, COMMONWEALTH OF VIRGINIA, REPRESENTING NATIONAL GOVERNORS' ASSOCIATION

Ms. **Amato**. Mr. Chairman and members of the committee, I appreciate having the opportunity to appear before you this morning on behalf of the National Governors' Association.

I am Carol Amato, executive director of Virginia's Governors' Employment and Training Division. I also serve as Virginia's State liaison for JTPA.

NGA has asked me to express its views on the Job Training Partnership Act reporting system and performance standards recommended by the Department of Labor and recently disapproved by the Office of Management and Budget.

My comments will focus on the letter of July 19, 1983, from OMB to DOL regarding DOL's proposed reporting system and performance standards. This correspondence outlines four primary reasons for OMB's disapproval of the proposed regulations by asserting that:

First, the reporting requirements exceed what is necessary for the Federal Government to meet its responsibilities under JTPA. In making this assessment, OMB finds universal reporting unnecessary and suggests that sampling can be used effectively to measure performance.

Second, the method for determining performance standards for each SDA requires States to follow precise methodology and use prescribed data in calculating performance standards.

Third, the proposed performance standard methodology limits the State's flexibility to adjust those standards for individual service delivery areas.

Fourth, the degree of prescription in the proposed regulation is inconsistent with the concept of the Federal-State partnership envisioned by JTPA.

As you might expect, much of what I have to say today in response to OMB's rationale reiterates the testimony you previously received in support of the DOL proposals, not only from NGA, but from the AFL-CIO, the National Alliance of Business, the National Association of Counties, the National Association of Private Industry Councils, the National Commission for Employment Policy, and the U.S. Conference of Mayors.

Today, in addressing OMB's points, this presentation will restate each in the form of a question and then summarize NGA's response.

First, does the JTPA reporting system proposed by DOL exceed what is necessary for the Federal Government to meet its responsibility under JTPA? The Job Training Partnership Act assigns the Secretary of Labor responsibility for the form and content of records and reports related to the performance of JTPA programs and for prescribing performance standards. NGA supports the proposed reporting system as necessary, sufficient, and consistent with the role that the act prescribes for the Federal Government.

The reporting system as proposed is necessary to meet the congressional requirement that the Nation's return on its investment in JTPA be measured. This system assures the collection of the uniform data necessary to establish a reliable, valid, and equitable method for establishing performance standards.

It also assures the collection of the uniform and comparable data necessary for effective program management and oversight at all levels. The system proposed by DOL will produce basic information needed by local, State, and Federal policymakers and managers as they plan, operate, and evaluate their job training efforts.

It is important to note at this point that the reporting system under discussion was not designed at the whim of overly zealous Federal bureaucrats. Rather, it is a reporting system grounded in sound, proven methodology and shaped by the input of representatives of the groups which ultimately will be responsible for JTPA's success or failure.

In his testimony before you on July 12, Pierce Quinlan, executive vice president of the National Alliance of Business, stated:

> When it comes time for Congress to assure JTPA performance and make the crucial decisions regarding its funding and future, reliable data on the participants served and program results will be essential. This is a time of scarce Federal resources and serious concern about spending priorities. The documentation of the costs and benefits of the Job Training Partnership Act must be valid.

The States second Mr. Quinlan's opinion, not only from the congressional perspective, but from the standpoint of the thousands of men and women who have become involved at the State level as PIC members, or who, as part-time elected officials, have volunteered their time to get JTPA going.

These people, too, have crucial decisions to make. They, too, demand reliable data. Many of the local governments, business representatives and other people who have become involved in JTPA in my State, for example, have done so because they have been assured that JTPA will define as its bottom line its success in getting people jobs, in increasing earnings, and in reducing cash welfare payments.

The reporting system proposed by DOL will give these people the data they want and need and because it is a national reporting system, it will give them objective standards and a broad perspective from which to evaluate their own efforts.

As the testimony you have received documents, far from being excessive, DOL's proposals represent the minimum data collection and reporting necessary to assure that JTPA, indeed, is a system driven by performance. In contrast to OMB's stance, we at the

State level believe not only that the reporting system is consistent with the act's requirements, but that it strikes the balance between Federal, State, and local responsibilities which the law requires.

In basing its disapproval on the Federal Paperwork Reduction Act, OMB's position draws attention to several critical questions. First, what exactly is the relationship between an Executive order and a piece of legislation? Which takes precedence when responsible officials believe that one conflicts with the other? Will the congressional intent expressed throughout the JTPA be affected adversely by OMB's interpretation of the Federal Paperwork Reduction Act?

When one looks past the Job Training Partnership Act, the act ceases to be the main issue in this ongoing discussion. Rather, we believe that OMB's interpretation of the Federal Paperwork Reduction Act and the power it exercises pursuant to it is of paramount importance and a subject which warrants further examination.

NGA has, and will continue to support the Federal Government's efforts to reduce unnecessary paperwork and extraneous reporting requirements. We do, however, have questions regarding the strategies and tactics used to enforce the provisions of the Paperwork Reduction Act. We do not want to see efforts aimed in increasing efficiency have the opposite effect.

The second question, Does the method for determining performance standards for each SDA require States to follow precise methodology and use prescribed data in calculating performance standards? Yes, it does, and the fact it does assures States and SDA's of a system that is consistent, neutral, fair, rational, reliable, and valid.

Certainly any evaluation strategy which is expected to be the basis for decisions regarding not only the expeditures of billions of dollars but, far more importantly, the opportunities to be afforded people in need of job training, must depend on precise methodology and prescribed data.

To require less would not meet the expectations of the taxpayers who fund the JTPA programs, of the people who operate them, or of the people who participate in them. The multiple regression analysis model which DOL uses certainly is not perfect, but it is a statistically sound approach which State governments and SDA's generally accept.

From the standpoint of both cost and time, the system as proposed is preferable to requiring by default that each State develop an alternative system.

The third question, Does the proposed performance standard methodology limit the State's flexibility to adjust those standards for individuals service delivery areas? The regression-based method proposed by DOL takes local differences into account. Statistically verified factors which affect program performance are used in the basic regression model to establish adjusted standards which allow equitable comparisons of programs enrolling different types of trainees.

Governors, then, may adjust the standards within parameters established by the Secretary of Labor to reflect further the unique conditions within certain service delivery areas. The method adequately balances the goal of setting objective performance standards with the need to allow for local differences.

The final question: Is the degree of prescription in the proposal inconsistent with the concept of the Federal-State partnership envisioned by JTPA? The testimony presented to the subcommittee on July 12 indicated general agreement on the roles the various partners were to play under JTPA. Comments made by Patricia Hogue, speaking for the National Commission for Employment Policy, captured the gist of the remarks made by several of the speakers.

Ms. Hogue compared the role of the Federal Government in JTPA to that of corporate top management which focuses on predefined outcomes, not process. She defined States as having the "key administrative role in the system" and as performing important "middle-management functions." She noted that the "partnership between local elected officials and representatives of the private sector, through private industry councils, shares full and equal responsibility and authority for program planning and delivery at the local level."

Within this context, it is important to note that the partnership so crucial to JTPA's success depends on the Secretary of Labor's assuming certain responsibilities, States others, and service delivery areas still others.

Sections 106 and 165 of the Act clearly assign the responsibility for reporting and performance standards to the Secretary of Labor. It is interesting to note that the primary partners all have expressed strong support for the data reporting system and performance standards proposed by the Secretary.

Denying DOL's request for approval of its proposed regulations, particularly given the near consensus which surrounds the request, confounds the process of building the partnerships necessary for JTPA's success.

OMB's disapproval places the various partners in the awkward position of being required to redefine roles to each had agreed. This redefinition will occur, not because the partners wish to do so, and not because they violated the provision of the partnership's charter, the act itself, but rather because OMB believes that the procedures they propose to follow run contrary to the Paperwork Reduction Act.

Certainly none of the JTPA partners seeks the proliferation of unnecessary paperwork or redtape. To the contrary, much effort has gone into collecting only the data essential to effective program management and to meaningful evaluation.

Commenting on OMB's disapproval of the DOL proposals, on July 21, the Washington Post editorialized:

> The redtape fighters in the Office of Management and Budget, however, are resisting the system on grounds that it is an undue burden on States and localities and inconsistent with the notion of block grant. That's a misreading on two counts. States and localities recognize that they need to monitor their programs anyway and it's just a question of whether that information will be useful in comparisons with other areas. Nor should Federal taxpayers be asked to support local programs without the assurance that the people who run them will be held accountable for their performance.

The important question now, it seems, is where we go from here. At least three alternatives have received serious discussion.

OMB urges the use of sampling as an alternative to national reporting.

Several groups have urged Congress to mandate legislatively the reporting system and performance standards proposed by DOL.

Similarly, several groups have urged the States to establish a voluntary national reporting system.

After analyzing each alternative, the National Governors' Association offers the following comments on each.

Sampling: Although sampling offers an alternative to including all trainees in national reporting, it has many disadvantages associated with it. For example, sampling will not negate the necessity of the Federal Government's establishing standard definitions to assure data consistency and comparability.

Although valid sampling requires standard definitions, it does nothing to assure that uniform data is consistently collected and reported as a function of each State's and each SDA's ongoing management process.

Consequently, sampling will not allow the level of confidence assured by what OMB has defined as universal reporting. Governors charged with awarding incentive grants to SDA's which exceed their performance standards and with sanctioning those SDA's which do not, must have the most reliable data possible on which to base their decisions.

PIC's and local governments similarly require the most comprehensive data possible, not only to assess their performance and to plan their programs, but also to draw conclusions about the factors that affect the performance of local programs. Samples simply do not stimulate the confidence among decisionmakers that universal data collection does.

Although sampling lends itself to public opinion polls and marketing surveys, it does not seem appropriate for establishing a data base in support of a multibillion-dollar program when the technology and expertise exist to build a universal data base.

Supporters of sampling point to anticipated cost savings. On closer examination, however, a case can be made that in the long run, sampling will be more expensive than universal data collection. It appears that the time lag in reporting data collected through sampling techniques may prove longer than that required to report information on all the trainees.

More importantly, if the Department of Labor bases its reporting on a sampling technique, at worst, it runs the risk of adding an expensive, incompatible layer of reporting on top of existing State and SDA processes. At best, it seems sampling will merely duplicate the data collected by some States and SDA's.

As noted in Ms. Hogue's testimony before you:

> Data collection systems are in place in 80 percent of the local areas that will be service delivery areas under JTPA. This existing reporting system closely mirrors the reporting requirements spelled out by the Labor Department in the April 26 Federal Register in terms of the data elements it will gather, although reports are to be made far less frequently than were required under CETA.

As Ms. Hogue and many others have concluded, changing the current system would likely prove more expensive and time consuming than would modifying the existing system to fit JTPA. Additionally, one must question the advisability of discarding a national reporting system which provides information which is valid and useful at all levels of the job training system. Before the current system is transformed into a national system based on sampling, we must have answers to many questions. How many States and SDA's will be included in the sample? How and when will the sample be selected? Will areas selected as part of the sample have to maintain different records? How will the system be financed? As these very preliminary questions illustrate, sampling could very well place a heavier burden on the JTPA system.

To answer these questions, DOL would have to repeat the rigorous process used to develop the nationally based methodology. It seems very unlikely that DOL will be able to repeat the process in time to keep the States and SDA's from having to develop multiple management information systems to accommodate the major change from universal coverage to sampling.

The second alternative that has been suggested is legislative mandates. While legislatively mandating the proposed reporting system and performance standards will certainly resolve the problem at hand, such action will also limit the flexibility JTPA administrators at all levels will have in modifying the reporting system to reflect changing needs.

It is critical that data collection and evaluation methodologies evolve to accommodate the new knowledge generated by technological advance and by experience.

While legislation will assure that the proposals indeed are implemented, administrative procedures promise a greater flexibility in adjusting reporting requirements and performance standards to changing conditions.

The third suggestion that is made is the voluntary national system. If it were possible to secure the agreement of the States to a voluntary system, the primary problems which would have to be addressed would center on money. States have already devoted significant portions of their financial resources to working with SDA's to develop good management information systems. The 5-percent set-aside extends only so far, and given current projected allocations, it appears that few, if any States, would have administrative funds to contribute to the support of a voluntary national reporting system.

In its July 27, 1983, issue, the employment and training reporter noted that an OMB source had told ETR that, "If States and localities feel that data on all participants are necessary, they should be willing to pay for it themselves, instead of using Federal funds."

Despite OMB's alleged observations to the contrary, the 15-percent ceiling on administrative costs at the local level and the 5-percent limitation at the State level make it virtually impossible for the SDA's and States to fund a national reporting system, even if it were their prerogative and responsibility under the JTPA.

In summary, the National Governors' Association urges OMB to reconsider its action. Of the available options, NGA believes that the proposal DOL made in April offers the greatest reliability, credibility, ease of implementation, cost-effectiveness, and, as the Washington Post noted, the assurance that the people who run the JTPA programs will be held accountable for their performance. Isn't this what JTPA is supposed to achieve?

I thank you for allowing me to share NGA's views, and I would be happy to answer any questions you may have.

Mr. **Frank**. Thank you, Ms. Amato.

Mr. McKernan.

Mr. **McKernan**. Yes; just a couple of questions.

What did you think of Mr. DeMuth's comments today about the fact that there really ought to be more discretion at the State level in whether or not to meet these performance standards and maybe furnish them with the information that is gathered but not require them to meet those particular standards, based on uniqueness of their particular States?

Ms. **Amato**. In responding to this, I am speaking for me and my State.

I have a couple concerns. I think it leaves Congress in a real bind. I don't how, if you were getting discretionary reports from 50 States, you would be able to draw conclusions about the program. From the State perspective, it also, I think, puts us in a bit of a bind because what we need is to use our performance standards more and reports more than in just reporting; in programmatic decisions as well.

If we don't have consistent data; if we can't be assured that we can look beyond ourselves at what is happening across the country, I think it gives us a very self-centered view in terms of our job training programs that I don't think is good for the development of the programs or for their operation.

Mr. **McKernan**. Could you explain to me—since you are more familiar with this whole program than I am, needless to say—why OMB seems to feel that it is fair just to set performance standards without taking into consideration the uniqueness of the people who are being trained in those States through a regression analysis, as opposed to DOL's proposal, which tries to take into consideration that uniqueness in various parts of the country?

Ms. **Amato**. I really don't understand that. That I understand concerns about the regression model. I think everybody has them, but we have got to choose something to do.

Given the limitations that we have in terms of statistical technique and everything, I think the regression model offers States and local SDA's the best option in terms of adjusting performance standards to local conditions. I think anything else, unless there is a method like that, unless it is nationally based, could lead to arbitrary and decisions that are based on somebody's best guess.

We have an issue right now—unemployment rates in Virginia range by jurisdiction from 2.7 percent to 27.5 percent. Our populations are very different. We have several areas that have large refugee populations. The SDA's believe that this factor will affect their performance. They would like to see the number of refugees considered in terms of the regression model. It is possible to do that.

If we didn't have some kind of statistical model like that, I think it would be people's best guess, well, sure the number of refugees affects performance you know? But we don't know for sure, and I think the regression model provides some kind of assurance that validated factors—although they are not complete, and I don't think anybody would argue that they are—does give good evidence for adjusting performance standards.

Mr. McKERNAN. How would the idea of sampling affect the recordkeeping of the various SDA's? Are you familiar with that type of a proposal and how it would actually be implemented?

Ms. AMATO. We don't know enough about what kind of sampling people are talking about. Is OMB talking about taking a sample of each SDA or is OMB talking about sampling certain SDA's in certain States? They are two very different approaches and we don't have enough information to know which they are talking about.

Whichever approach it is, it depends on how the sample was set up. If it were based on the systems we already have in place, then, as I said in my testimony, at best what we would be doing probably is just duplicating what we already have in terms of report submission.

It is possible, though, that the sample could require the collection of data different than what we have. If it does, then it would impose another reporting layer on what we are already doing.

Mr. McKERNAN. I would like to just have you comment on this, as I said, as somebody who is more experienced in this than I. I wonder whether we ought not to be setting up the kind of data that we want collected, and have that data collected at the national level, and if we are going to make any changes, make the changes in what we as a Federal Government do with the data that is collected, as opposed to trying to put a different burden on different SDA's to furnish the information—the limited amount of information that the Federal Government may decide it wants.

Could you respond to that?

Ms. AMATO. I think it is important that—a couple things. Eighty percent of the areas currently have in place a system that builds on the CETA system—and it is there. We are one of those States. We have a statewide MIS system that we have operated since 1980. We have a lot of money invested in that.

We began in April to revise our system to accommodate JTPA. Here we are, in August. We are ready to go with it. It is important, I think, in terms of the data collection that the States will do to try to have a minimum disruption in terms of the systems that are already in place.

It is too costly to do something else. And I think the data we are collecting is the good data that you need. I think if you can do that, if you can maintain consistency in terms of the data collection and then talk, if you want to, about what you want to do with what we collect, as long as it is based on what is already there, it would make sense.

To totally change the system, to say to us at this point, we want to collect different elements, or we want you to collect them in this kind of way and to separate the reporting requirements from the administrative requirements that we have now in terms of reporting, I think, would be a big mistake.

What we have now is a system that can be used for both, administrative oversight and reporting. It makes for ease and it is very cost effective.

We also would strongly support the universal data collection. We think that is very important.

Mr. **McKernan**. Thank you.

Ms. **Amato**. Thank you.

Mr. **Frank**. Thank you, Mr. Amato. I appreciate very much the testimony. It has been very helpful.

Are you aware of any Governors who object to what DOL proposed?

Ms. **Amato**. No, sir, I am not personally, and I don't know whether the NGA staff has heard of any who do not support it.

Mr. **Frank**. Then we do know that obviously many Governors support this position.

You heard Mr. DeMuth's timetable. It seems to me unless they change their intentions very rapidly, we are talking about a timetable which may not give us the final thing until late in October or early in November, or maybe even later.

What does that do to the ability of the States and the others to run this system well?

Ms. **Amato**. It places a great burden on us. We have out for comment right now in my own State proposed guidance for SDA's in terms of their reporting, the kinds of data we want them to collect. As I mentioned, we have a group that has been working on updating our management information system since April. That requires hardware and software development. That takes time.

The delays really put in jeopardy more than just reporting, the whole management structure for the program.

Mr. **Frank**. You may find that money you have spent, and time that has been spent will have been wasted, in effect, because they may now come up with something very different. On the other hand, I assume if you had not done anything, but simply sat back and waited, you would then have been subject to criticism because you would not have been ready the way you should have been.

So I am struck again by the paradox of a procedure that purports to be reducing the burden on the States and reducing paperwork, which, in fact, is greatly increasing both the burden and the paperwork because you have had to do things twice in some cases. Also, you make an important point and I think this is one of the problems that OMB does not seem to have focused on. When they make a decision, none of us then want the States to unilaterally execute it without further consultation with the SDA's and with the other partners.

They are focusing, it seems to me, on their own administrative convenience and the timetable, and not with what happens after they have made their decision.

You, then, have the responsibility at the State levels of carrying this out, working with the PIC's and the SDA's in a very reasonable way, and they are simply not leaving you the time to do that.

Ms. **Amato**. The timeframe is so tight, anyway. It is virtually impossible to accomplish everything that needs to be accomplished by October 1. In setting up priorities, we set this as a priority because it is so important to the management of the program that the delay would be especially critical, I think, in this area.

Mr. **Frank**. Well, I appreciate it and I think it is unfortunate that OMB has conducted itself in a manner in which they have not been able to get this input from you. I am going to send over the transcript here and urge them to read it.

I personally think that this committee, the full committee, probably has to look into the operation of the Paperwork Reduction Act and mandate to OMB that there be some procedures for consultation and discussion. What happens now is you get to talk to the agency, but the agency may not be the operational decisionmaker.

Thank you very much. We appreciate your coming.

Ms. AMATO. Thank you.

Mr. FRANK. Next, we will hear from Mr. Markley Roberts, representing the AFL-CIO.

STATEMENT OF MARKLEY ROBERTS, ECONOMIST, AMERICAN FEDERATION OF LABOR-CONGRESS OF INDUSTRIAL ORGANIZATIONS

Mr. ROBERTS. Mr. Chairman, with your permission, I would like to put my statement in the record and abbreviate it orally.

Mr. FRANK. I anticipate no objection from Mr. McKernan, so with that, we will put it into the record.

Mr. ROBERTS. Thank you.

My name is Markley Roberts. I am an economist for the AFL-CIO. The AFL-CIO is pleased that this subcommittee has again called this followup oversight hearing on implementation of the Job Training Partnership Act.

Nothing in the act suggests to us that Congress intended to relinquish Federal oversight over the JTPA program. Yet, that is how the Office of Management and Budget seems to see it.

OMB's rejection of reporting requirements proposed by the Department of Labor is an insult to those of us who are working in good faith to establish the effective performance-oriented training system envisioned by the JTPA.

This act will substantially decentralize employment and training—the Federal employment and training system. The State Governors will assume many of the administrative functions that the Federal Government used to perform under earlier training legislation, but the JTPA does not excuse the Federal Government from the responsibility to keep a close watch over JTPA programs.

After all, JTPA is Federal legislation and its programs are supported with Federal dollars. The legislation addresses employment problems that are national in scope. While JTPA allows States an increased role, all training programs are to be held up to the same set of national standards and protections to make sure our job training system really delivers what is promised to jobless people.

The law calls job training an investment in human capital. Congress wisely recognized that to get the most from this investment, certain kinds of leadership and guidance must be maintained on the Federal level.

One example of this is the law's mandate to the Department of Labor to set criteria for measuring the law's impact so that Congress and the American people will know what we are getting for our money. The AFL-CIO, therefore, supported development of performance standards and reporting requirements for the new JTPA system.

Without a national yardstick for measuring results, JTPA will amount to little more than funny money for the 50 States to do with as they please. Therefore, the AFL-CIO endorsed the performance standards and reporting requirements proposed by the Department of Labor on April 26.

Early last month, AFL-CIO President Lane Kirkland wrote to OMB Director David Stockman to express support for the approach suggested by the Labor Department, so it was with considerable dismay that we learned last week OMB has rejected the proposed reporting system for JTPA.

As we understand OMB's criticisms, the system of the Labor Department was rejected on two grounds: First, because it wouldn't give the Governors enough leeway to tailor performance standards to specific local conditions; and second, because it requires universal reporting rather than sampling to get data on results.

We are frankly baffled by these criticisms. First, the proposed methodology specifically allows the Governors to vary performance standards for local areas where there are special conditions that would affect the program, such as a major plant closing.

Moreover, the regression analysis formula for setting performance standards automatically allows unique local conditions to be programed into the performance standards for each individual service delivery area. It is hard to see how the system could be more flexible in responding to local situations.

Second, OMB criticized the proposed universal data collection system as burdensome. Submission of once-a-year report on participants and costs does not sound excessive to us. Rather, it sounds like the minimum level of data that can still provide Congress and the administration with the information they need to oversee the program and to formulate future policy on jobs and training.

We at the AFL-CIO consider national performance measures vitally necessary if we are to know how JTPA programs are working. Without a uniform system applicable to all States, policymakers and lawmakers will not be able to make judgments about training approaches that are worth the Federal investment and those where further spending cannot be justified.

We believe the Job Training Act anticipates and requires Federal oversight in leadership in achieving its important training goals. We do not consider OMB's action on this matter to be consistent with the language of JTPA. To us, it appears that the intent of the act as being flouted, that the responsibilities Congress vested in the Department of Labor are being deliberately and contemptuously disregarded.

If left unchecked, this action could not only harm the new training system, but could establish an undesirable precedent for other programs where Federal leadership is critical.

I hope this subcommittee and the Congress will consider the broader implications of OMB's position, not only for JTPA, but also for other Federal programs where Congress has entrusted the Federal Government with specific responsibilities.

Let me say that the AFL-CIO supports the training objectives of JTPA. We do have some concerns about the lack of Federal leadership in the implementation of the new act, but we are making every effort through our AFL-CIO Human Resources Development Institute to cooperate in establishing the new training system and to make it a success. We are working through HRDI to establish partnerships between Government, labor, and management that will be critical to the success of JTPA.

I might say, also, finally, Mr. Chairman, that 14 or 15 years ago, I myself engaged in a regression analysis of a training program for inner-city disadvantaged youngsters. I went through the process of doing a regression analysis and I am aware of the problems and the limitations that enter into this kind of analysis and the results that you get from it.

Nevertheless, again, without setting myself up as a statistical expert or an expert on regression analysis, it seems to me that this is a reasonable and objective approach which can be modified as experience suggests that further inputs should be included in the regression analysis.

So I don't have any problem with the regression analysis and the model stemming from that kind of analysis.

I thank you for this opportunity to express some of our AFL-CIO concerns. We thoroughly support the efforts of this subcommittee to make sure that JTPA is implemented in a manner consistent with its authorizing legislation.

That completes my statement.

[The prepared statement of Mr. Roberts follows:]

STATEMENT BY MARKLEY ROBERTS, ECONOMIST, AFL-CIO
TO THE MANPOWER AND HOUSING SUBCOMMITTEE,
HOUSE COMMITTEE ON GOVERNMENT OPERATIONS
FOR JOB TRAINING PARTNERSHIP ACT OVERSIGHT HEARINGS

August 2, 1983

The AFL-CIO is very pleased that this Subcommittee has again called an oversight hearing to review the implementation of the Job Training Partnership Act. Critical policy decisions are being made during this transition period that will have lasting effects on the effectiveness of the new training system. We are glad this Subcommittee has provided this opportunity to review the foundations that are being laid for the new training system before the act formally goes into effect on October 1, 1983.

In enacting JTPA last October, Congress reaffirmed the importance of an effective national employment and training system. Such a system holds great promise for meeting the needs for our unemployed and disadvantaged citizens -- needs for new job skills and the opportunity to qualify for decent and satisfying employment.

Nothing in the act suggests to us that Congress intended to relinquish federal oversight over the program. Nothing in the act suggests that JTPA is just a giveaway to the states. Yet that is how the Office of Management and Budget seems to see it. OMB's rejection of proposed reporting requirements is an affront to those of us who are working in good faith to establish the effective, performance-oriented trainings system envisioned by the JTPA act.

It's true, JTPA will substantially decentralize the employment and training system. The state governors will assume many of the administrative functions that the federal government used to perform under earlier training legislation. But as we read the act, JTPA doesn't excuse the federal government from its responsibility to keep a close watch over JTPA programs.

After all, JTPA is *federal* legislation. Its programs are supported out of *federal* dollars. The legislation addresses employment problems that are *national* in scope.

And while JTPA allows the states an increased role, all training programs are to be held up to the same set of national standards and protections — to make sure our job training system really delivers what is promised to the jobless people of this country.

JTPA calls job training "an investment in human capital." We at the AFL-CIO believe this investment is one of the most critical ones our country can make. Congress wisely recognized that to get the most from this investment, certain kinds of leadership and guidance must be maintained from the federal level.

One example of this is the act's mandate to the Department of Labor to establish criteria for measuring JTPA's impact — so Congress and the American people will know what we're getting for our money.

The AFL-CIO has therefore supported the development of performance standards and reporting requirements for the new JTPA system. Without a national yardstick for measuring results, JTPA will amount to little more than funny money for the 50 states to do with as they please. We thus endorsed the performance standards and reporting requirements proposed by the Department of Labor on April 26.

Early last month, when the AFL-CIO learned that the Office of Management and Budget had reservations about the Labor Department's proposal, President Kirkland wrote to OMB Director David Stockman to voice support of the approach suggested by the Labor Department. So it was with considerable dismay that we learned last week that OMB has rejected the proposed reporting system for JTPA.

As we understand OMB's criticisms, the system was rejected on two grounds — first because it wouldn't give the governors enough leeway to tailor performance standards to specific local conditions; and second because it requires universal reporting rather than sampling to get data on results.

We're frankly baffled by these criticisms. Organized labor unfortunately was not included on the Advisory Committee that helped develop the reporting system — as we were under past Administrations. But to the best of our understanding, the Labor Department proposal cannot be fairly faulted on either of OMB's points.

First, the proposed methodology specifically allows the governors to vary performance standards for local areas where there are special conditions that would affect the program — such as a major plant closing. Moreover, the regression analysis formula for setting performance standards automatically allows unique local conditions to be programmed into the performance standards for each individual service delivery area. It is hard to see how the system could be more flexible in responding to local situations — and still produce meaningful national data.

Second, OMB criticized the proposed universal data collection system as burdensome. We understand that sampling was considered by the Labor Department but discarded because of certain management, technical, and cost considerations. As I said, the AFL-CIO was not a party to the development of the proposed reporting requirements. But the submission of a once-a-year report on participants and costs does not sound excessive to us. Rather, it sounds like the minimum level of data that can still provide Congress and the administration with the information they need to oversee the program and to formulate future policy on jobs and training.

So we don't see that OMB's criticisms are well founded.

As I told this Subcommittee on July 12, the AFL-CIO considers national performance measures vitally necessary if we're to know how JTPA programs are working. Without a uniform system that's applicable to all the states, we will not be able to make judgments about training approaches that are worth the federal investment, and those where further spending can't be justified.

A wealth of experience will be acquired under the new job training act. That experience can help us better understand how to help the disadvantaged and the dislocated — how to meet the changing skill requirements of the workplace — and how to ensure equal opportunities for groups that did not have full access to good jobs. As we read this act, Congress did not intend that experience to be wasted through the failure to gather adequate information about the program.

Labor is especially concerned about the implications of OMB's action for future employment and training programs. Without good data on program outcomes, how will policymakers or lawmakers justify future job-training expenditures? How will they be able to prove that this investment in human capital is worth it? For those in need of job training assistance, the lack of supporting data could be tragic indeed.

When Congress enacted JTPA last fall -- amidst the greatest unemployment crisis since the Great Depression -- I don't think it inteded to abdicate all federal responsibility for jobs and training. Far from it. The act clearly anticipates federal oversight and leadership in achieving its important training goals.

The AFL-CIO does not consider OMB's action on this matter to be consistent with the language of JTPA. To us, it appears that the intent of the act is being flouted -- that the responsibilities Congress vested in the Department of Labor are being deliberately disregarded. If left unchecked, this action could not only harm the new training system but could establish an undesirable precendt for other programs where federal leadership is critical.

I would hope that you and your colleagues on the Hill will review this matter with the greatest care. I trust you will consider the broader implications of OMB's position -- not only for JTPA but also for other federal programs where Congress has entrusted the federal government with specific responsibilities.

I want to take this opportunity to reiterate the AFL-CIO's support of the training objectives of JTPA. We have concerns about the lack of federal leadership in the implementation of the new act. But we are making every effort, through our Human Resources Development Institute, to cooperate in establishing the new training system. We are working through HRDI to establish the partnerships between government, labor, and management that will be critical to the success of JTPA. Through these partnerships, we hope JTPA can make its mark on the training needs of the unemployed throughout this country.

Thank you for this opportunity to express our concerns to your Subcommittee. We thoroughly support your efforts to assure that JTPA is implemented in a manner consistent with its authorizing legislation.

I hope you will continue to call on us for any further assistance we can provide.

Mr. **Frank**. Thank you, Mr. Roberts.

Mr. McKernan.

Mr. **McKernan**. Mr. Roberts, did you interpret Mr. DeMuth's testimony to mean that OMB did not favor any national performance standards?

Mr. **Roberts**. That was the way I interpreted his remarks.

Mr. **McKernan**. Well, I was a little unclear on that and I guess you have raised more doubts in my mind. I thought what he was saying was we could form some general performance standards without using this regression analysis, which, under my interpretation of his testimony, would only tinker with those standards as they applied to various SDA's that had unique characteristics and that there still would be national performance standards; there just wouldn't be the kind of changes based on the data that had been collected for each particular area.

Am I right——

Mr. **Roberts**. I think there was some inconsistency between what appeared in his letter to Ms. Bolden and what he was saying today because it seems in the letter, he was saying, in effect, we have rejected out of hand what the Labor Department has proposed.

Today he was talking about having further discussions, so I am glad they are going to have further discussions, but I really found some inconsistency there, but I was led to interpret it as a unwillingness to accept or go for national standards.

Mr. **McKernan**. I was—I guess that was the thing that confused me today with the testimony. It was my understanding that they wanted to set up national standards, but that they did not want to alter them for various SDA's based on the results of the regression analysis because they weren't sure that that was a proper analysis and that it, in fact, was something that ought to be taken into consideration on standards, but rather ought to, through sampling, be given to the States as just some interesting information that they might want to use to change their own programs on a State-by-State basis.

I guess my concern with that is that if it is difficult to come up with a proper regression analysis, it may be just as difficult to come up with any performance standards that really are meaningful or accurate for particular areas. I guess that is something we are going to have to try to clarify in writing because I would agree with you that this is a Federal program and there ought to be some Federal oversight of the success or failure of the program in the various States if we are going to be spending our money on it.

There is just one other thing on that. Do you feel that the sampling idea could increase paperwork, as opposed to decreasing it, as has been suggested by Mr. DeMuth?

Mr. **Roberts**. When you say "paperwork," and if you mean by that, actual pieces of paper, I don't know. What I do know is that it would be much, much easier to have the uniform system which could be very easily turned into a computerized analysis. If you are going to do a nationwide sample—again, I am not clear on whether that would be a national sample prepared and drawn up by the Labor Department, but it seems to me that for administrative ease, and, in fact, reduction of physical paperwork, the uniform national reporting system is going to be much easier on all concerned.

BEST COPY

I think to do an after-the-fact survey, and I have had some experience with that, too, and it is just very, very difficult when you have to rely on people's memories after the fact rather than to rely on administrative data that are collected on current basis. It is also a lot more costly and apart from the ease of collecting the data and analyzing it under a national reporting system, it just seems to me that to do a national survey that would be at all comparable to the results you would get from a universal reporting system, it would just be horrendously expensive and burdensome for all concerned.

Mr. **McKernan**. That is sort of my feeling, too.

Thank you.

Mr. **Frank**. Thank you. I take Mr. McKernan's point and I would just like to join him. It does seem to me that the thrust of what Mr. DeMuth was saying is that we would have no national performance standards because the regression analysis is an effort on the part of the Labor Department, in conjunction with others, to have national performance standards that are sufficiently flexible to take into account local differences.

It seems to me that Mr. DeMuth is saying, this is such an inherently difficult thing to do that we will never meet the standard of intellectual perfection that OMB is setting with regard to the ability to take into account local deviations. Therefore, the answer is no effort to have a national measurement; there will be this suggested model they can use. The OMB argument does seem to me to go very much in that direction.

I think it is an effort to prevent us from having the kind of national reporting system that is useful if we are going to be able to go ahead in this area.

Mr. Roberts, in terms of the activity we are talking about—and I share your regret that the AFL-CIO was left off the Advisory Committee here—have you, on behalf of the AFL-CIO and your local affiliates, had a chance to participate adequately in the development of this process?

Mr. **Roberts**. I would say that we have not had that opportunity to participate. I noted your question to Mr. DeMuth about responses to the letters that they had received. I might say that we have not had any response to the letter from Lane Kirkland to Mr. Stockman. I would say we would like to have more opportunity to participate in——

Mr. **Frank**. Well, for instance, as someone who himself has a background in regression analysis and similar type of work, has there been a suggestion to assemble a group to try and improve on it. Have they approached anybody in that way, to your knowledge?

Mr. **Roberts**. Not to my knowledge.

Mr. **Frank**. Well, I appreciate it. There isn't any more that I have to add except to say that it seems to me, even more now than before, that in the name of efficiency and paperwork reduction, OMB is causing severe impediments in this program and that ideological rigidity is getting in the way of a consensus that wants to run the program.

I believe that this is something that we may have to address legislatively. Let me just say I think the National Governors Association's point was correct, that it would not be a good thing to lock in a particular type of regression analysis into legislation. For one thing, certainly neither Mr. McKernan nor I want to be on the floor explaining the details of this regression analysis to our colleagues. But it does seem to me, in this case, an appropriate alternative would be to amend the legislation to give the Labor Department the right to make some of these promulgations.

In other words, in terms of the Paperwork Reduction Act, we are not talking here about excessive requirements on private industry. We are really talking almost about an intergovernmental relations situation.

I think an appropriate compromise might be if we can't get this out soon, and I am afraid it may still be hanging when we come back, that we might just have to empower the Labor Department to go ahead with its proposal. I have to say that my view, based on these hearings, is that the Labor Department has really performed in a very competent and very fair manner.

They have met with the various groups; they have achieved a consensus that might have seemed difficult to achieve; and I am sure it is aggravating to almost all concerned to have OMB upset this in the fashion that it has.

I thank you all very much and the hearing is adjourned.

[Whereupon, at 11:07 a.m., the subcommittee adjourned, to reconvene subject to the call of the Chair.]

APPENDIX

MATERIAL SUBMITTED FOR THE RECORD

Jobs Watch

Testimony

on

Department of Labor Administration of the Job Training Partnership Act

by

Morton H. Sklar
Legal Counsel
Jobs Watch

Before

The Manpower and Housing Subcommittee

House Government Operations Committee

July 12, 1983

Editor
James S. Byrne
Legal Adviser
Morton H. Sklar
Staff Writer
Erica E. Tollett

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Washington D.C.
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(202) 659-1062

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Director
William L. Taylor

Congressman Frank and Members of the Subcommittee:

My name is Morton Sklar. I direct and serve as legal counsel for the Jobs Watch project of the Center for National Policy Review of Catholic University Law School.

Jobs Watch is a public interest group that monitors the operation and impact of government programs and policies effecting the unemployed. We issue periodic publications dealing with some of the major issue areas related to joblessness.

A major focus of our current work is the transition from CETA to JTPA, and the role played by the Department of Labor in administering the new program. Copies of our two most recent publications relating to JTPA have been provided to your staff, and have been made available at these hearings.

I. Introduction -- Getting JTPA on Track

Early indications we have received from local officials and community groups across the country suggest that

1. major problems are emerging in the operation of the JTPA program;
2. many of these problems threaten to undermine some of the most important objectives that Congress set for JTPA; and
3. the failure of the Department of Labor to take a more active and effective role in administering JTPA is a major contributor to the problems being reported.

There still is ample opportunity to take action to get JTPA back on track, and the action that is needed is entirely consistent with JTPA's underlying premise that greater discretion and control should be given to state and local governments in planning and administering training programs. But we are deeply concerned that the Department of Labor has seriously miscontrued that objective by taking a virtually hands-off, laissez-faire approach to its monitoring responsibilities under the JTPA statute. As a result, some of the principal statutory objectives established by Congress are in jeopardy.

Specifically, the Department of Labor has

1. failed to provide adequate guidance and assistance to promote an effective transition to JTPA;
2. refused to adopt effective performance standards that would help assure the achievement of JTPA's goals; and

3. neglected to carry out necessary oversight responsibilities to produce compliance with major statutory objectives.

II. Inadequate Guidance from DOL

Most state and local governments welcome the increased flexibility given them by JTPA to plan and manage their employment training programs. At the same time, during the past months they have frequently expressed an urgent need for guidance and assistance from DOL on the meaning of JTPA requirements and the procedures to follow to ensure a smooth transition. More often than not this type of positive support and assistance has not been forthcoming. At initial JTPA orientation meetings in the field, and early sessions of DOL's JTPA state liaisons and its JTPA Advisory Council, DOL responded to questions and requests for interpretations of JTPA requrements by indicating that these matters were to be left entirely in the hands of state officials. Numerous statements were made at these sessions in late 1982 and early 1983 by Roberts Jones, Administrator of DOL's Employment and Training Office, Pat O'Keefe, director of JTPA transition, and other DOL officials, expressing DOL's strong disinclination to become involved in JTPA issues. The expression, "What you see is what you get," referring to the statute and regulations, became the byword for DOL's refusal to provide more substantive guidance and support.

State and local officials were not asking for control and supervision from DOL. They were seeking help and advice in dealing with many unclear aspects of JTPA transition. They were left frustrated and confused by DOL's refusal to become involved.

One of the principal findings of the National Commission for Employment Policy, in its January 14, 1983, Initial JTPA Report was that

> "federal policymakers have adopted a hands-off policy with respect to the transition, putting the states, in effect, on their own at a time when many feel ill-prepared to handle JTPA's new complexities along with the demands of CETA's closeout." p. 5.

It was not until the State Liaison meeting of April 20 and the Advisory Council meeting the following day that DOL made anything resembling a positive effort to provide some of the necessary back-up support and guidance that so many state and local officials had been fruitlessly demanding in the critical early months of the transition. At those sessions, DOL provided a detailed explanation of several key aspects of transition procedures, and designated specific DOL staffers as contacts for different types of problems and questions.

Even at these sessions, DOL officials sought to leave a strong impression that little more in the way of guidance would be provided. "What we have set out here is the end of the federal activity," Jones said. "You'll leave here today with virtually everything there is. After this, the ball will be in the states' court. In terms of JTPA operations, we are coming to the end."

III. Problems Have Resulted

The absence of a more positive guideance role from DOL has been a major factor in the development of some of the problems that have arisen during JTPA's transition.

A. Exclusions from Planning Bodies

Kentucky, South Carolina and Washington are among the states reporting controversies related to the exclusion of state legislators from JTPA's state employment and training councils. Many local jurisdictions report similar problems with respect to the lack of representation of community-based groups on newly reconstituted private industry councils.

Virtually the only guidance provided by DOL on this critical matter was included in a "Questions and Answers" memorandum distributed by DOL to its regional administrators. Three "Questions and Answers" memos of this type were issued in March and April covering a total of 38 brief replies to commonly posed questions (DOL Field Memo No. 61-83).

DOL's "answer" in this case was to repeat the language of Section 122 (a) (3) (B) of the statute, underlining one phrase that emphasized the governor's discretion in making council selections. Not only was the response inadequate, it was incorrect and misleading, since it implied that state legislators could be excluded despite strong indications to the contrary in the legislative history and statutory language.

Roberts Jones of DOL also indicated that they would take no action to deal with the problem if it were raised with them in the form of a complaint. "We don't intend to tinker with this type of situation within the state," he said._/

B. Inadequate Service to Youth

Although JTPA mandates that 40 percent of training assistance be earmarked for eligible youth, and that drop-out youth be served propor-

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_/ Meeting of National Conference of State Legislators, Washington, D.C., April 11, 12, 1983.

tionally to their incidence in the population, there are already indications that these requirements will not be carried out effectively.

In Houston, the private industry council has adopted policies that would exclude from training anyone without a high school or graduate equivalency diploma, and anyone who previously participated in an employment training program. These policies directly contravene JTPA's objectives of serving those facing the most serious, long-term barriers to employment, and especially the goal of giving drop-out youth an increased opportunity for jobs before they become a regular part of the jobless population.

Since JTPA is not yet operational, this still must be considered a CETA problem. However, every indication points to the fact that the Houston PIC plans to continue these policies under JTPA as well. The latest information we have received is that city officials have refused to give a number of complainants the opportunity for formal hearing on their complaints that is mandated by the CETA statute. They also have failed to meet the 60-day time period allotted in the law for settlement of disputes at the local level.

Numerous other jurisdictions report a similar, though not quite as blatant tendency towards the "creaming" of participants. This means that the long-term unemployed and drop-out youth, who are principal targets for JTPA assistance, are excluded in preference for those easier to reach and serve.

Certainly, DOL is not responsible for the adoption of these policies. But its "hands-off" philosophy and refusal to become involved more actively in assuring compliance with critical statutory standards, has contributed to the likelihood that policies and practices inconsistent with the law will be adopted and followed at the local level. Unless a clearer signal of willingness to ensure compliance with JTPA's statutory mandates is given by DOL, policies and practices will be set in motion in the early months of the new program that will seriously threaten its ability to assist the unemployed effectively.

C. Slow Progress on JTPA Implementation

DOL deficiencies also are reflected in the extensive delays that are being experienced in setting up JTPA procedures at the local level. As of June 30th, 54 of 57 state (and territorial) recipients had completed SDA designations. But certification of the private industry councils was complete in only 17 states (less than one-third), with 16 others certifying some but not all of their PICs.

These delays are particularly significant, since local implementation plans are due in August. Without the PICs being in place, local jurisdictions will be facing a choice between delaying implementation of JTPA, or have plans adopted by chief elected officials without the extensive business and community role in the planning process that JTPA seeks to achieve.

Similar delays and problems were experienced in the SDA designation stage. The National Commission for Employment Policy reported that SDA designations ran so far behind schedule that, as of January 14, 1983, few states had made any real headway in the task._/ Equally important,

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_/ p. 1 of the Commission's Initial JTPA Report.

the Commission noted that "most states report they are receiving little substantive help on how best to proceed" from DOL.

One consequence of the extensive delays, the Commission suggested, was that few states did an effective job of involving "a wide range of interests -- CETA sponsors, legislatures, or educational agencies -- in their JTPA decision-making, and almost none . . . seem to be talking with private business representatives vis-a-vis the various SDA options under consideration."_/

If this pattern continues, and the status of PIC certifications appears to indicate that it is, JTPA's objectives of securing more effective involvement of business in training plans and projects, and promoting wider involvement of affected groups in decision making, will be undermined.

DOL is not solely responsible for these problems, but, as the Commission reported, their failure to take a more active and helpful role in the critical initial stages of implementation has most certainly increased the difficulties, and the negative results.

Equally disturbing are recent reports that similar delays are taking place in the implementation of the two most recent Congressional enactments aimed at providing special assistance to the unemployed because of the prolonged effects of the recession. Last week, the Washington Post reported that both the Emergency Jobs Bill and the Gas Tax programs were seriously behind schedule. These programs are, at least in part, under DOL administration, and tie in to some extent with the JTPA structure.

_/ Ibid.

IV. Performance Standard Inadequacies

Listening to DOL officials express their extreme disinclination to become involved in JTPA problems led one PIC member of JTPA's Advisory Council to remark, "I don't hear anything that says the state is accountable to anyone to do what it's supposed to do!"_/ DOL, unfortunately, has nurtured this impression, and has thereby sown the seeds for numerous noncompliance problems comparable to Houston's exclusions of drop-outs and former CETA recipients.

Nowhere is this more clearly seen than in the proposed performance standards system outlined in the April 12 and 26 Federal Registers.

One key area of inadequacy in DOL's proposed system is the treatment of youth participants. Standards that would measure whether youth had attained necessary employment competencies are mandated under the statute, but have been omitted in the DOL regulations. Instead, DOL has plans to issue a "technical assistance guide" that would provide a number of nonbinding suggestions on performance criteria systems. This is one of the most important areas where concrete guidance that would produce nationally uniform and comparable results is required. Yet DOL has chosen to ignore the statutory requirement and has refused to provide standards for employment competency testing.

DOL's decision contravened a specific recommendation favoring the issuance of competency standards that was made by DOL's own youth performance standards advisory committee -- a group consisting of recognized youth training experts. The advisory group suggested adoption of primary guides or model systems for each area of

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_/ Pat Moore of San Diego's PIC, at the December 15, 1982 meeting.

employment competency. Their view was that without such concrete recommendations extensive confusion and lack of uniformity would result, since most local jurisdictions do not have the required experience or training to make informed choices on youth employment testing systems.

It is noteworthy that a private non-profit firm, the Remediation and Training Institute in Alexandria, Virginia, has compiled a catalogue of model youth competency testing systems in a form that could easily be used by DOL to provide governments with effective and uniform standards. DOL's rejection of this available approach, against the recommendation of their own youth advisory group, and contrary to a clear statutory mandate, is one of the most serious instances of their failure to carry out JTPA monitoring and support responsibilities adequately.

DOL also has omitted youth as a category from the follow-up tracking system designed to assess whether JTPA assistance produces the desired results. The New England Training and Employment Council are among those who have pointed out the inappropriateness of this omission, given JTPA's focus "on serving youth and on providing youth with competencies aimed at enhancing their employability."_/

Another problem with the proposed tracking system is DOL's decision to reduce the period for follow-up from the originally proposed 26 weeks to 13 weeks. This change seriously compromises the ability of DOL, or outside researchers, to evaluate JTPA's impact and effectiveness.

Serious deficiencies in the proposed standards also have been noted with respect to the failure to assure effective targeting of assistance to welfare participants and drop-out youth. Both groups are identified

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_/ Letter to DOL of May 23, 1983, p. 2, para. 8.

as principal beneficiaries under the JTPA statute. Yet, the formula for incentive payments, designed to reward effective programs, does not include measures of service to school drop-outs, or for reaching the statutory goal of targeting 40 percent of funds for disadvantaged youth. In addition, the National Commission for Employment Policy, and the National Governor's Association, have both pointed out what they see as "a built-in disincentive to serve large numbers of welfare recipients by including welfare recipients within the adult total for purposes of calculating the adult placement performance standard."_/

A final area where DOL's approach to performance standards has been widely criticized is the absence of parameters for governors to use during the first nine months of JTPA operations. The National Commission for Manpower Policy points out that "the statute requires the Secretary to establish parameters, and incentive awards can be made based on the first year's performance." DOL's refusal to set clearer performance guidelines for the initial nine month period, the Commission notes, may subject governors "to considerable public criticism . . . and unbalances a key Federal-State-local relationship under JTPA."_/

One or two of these deficiencies in the performance standards might be excused as an oversight. But the large number of areas where major deficiencies have been uncovered, deficiencies that relate to basic objectives of the JTPA statute such as service to youth and welfare clients, indicates something more. They appear to be part of the more general pattern we have described of DOL making a conscious effort to reduce its involvement,

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_/ NGA letter of May 26; NCMP letter of May 25, p. 3.

_/ NCEP letter of May 25, p. 3, para. 3.

oversight and assistance well past the point where Congress' objectives for JTPA are placed in jeopardy.

VI. Conclusion

When Congress established the JTPA program, giving emphasis to local control and discretion in the administration of training projects, it could not have intended for the Department of Labor to reduce its monitoring and support activities to the extent that has taken place in these first months of transition. State and local officials, eager for assistance and guidance in applying statutory requirements, have been frustrated. Key target groups, such as youth, school drop-outs, and the long-term unemployed find their ability to receive JTPA assistance limited through a variety of federal and local policies. Major shortcomings have been noted in the performance standards system which is seen as providing the basis for gauging program results, providing performance incentives, and organizing project efforts.

If these deficiencies are not corrected before JTPA becomes operational, and before basic policies and procedures are selected by local governments and service delivery areas, the foundation for JTPA's operation in the coming years will be dangerously flawed. Critical to making these improvements is a change in DOL's basic conception that it plays a minimal role in the JTPA process. DOL can provide positive support to state and local governments seeking help. They can exert a positive influence in helping to assure effective performance. They can act to secure compliance with the statute's principal service objectives.

If these changes are not made, the likelihood that JTPA can fulfill its promise of bringing more effective assistance to the long-term jobless, under a system that emphasizes state and local discretion, will be placed in serious question.

A special word must be added about a related matter that shows DOL's capability and willingness to take its oversight responsibilities more seriously in other circumstances. A DOL official has shared with us a memorandum indicating that its Washington office has requested each of its Regional Administrators to report on whether certain named organizations that have been active in anti-workfare efforts received any CETA funds or contracts in 1982. Specific organizations "that have been alleged to have participated in anti-workfare demonstrations" are listed.

The implication is that groups speaking out against the application of workfare requirements should not be receiving DOL funds.

Apparently, DOL is willing to play a more active role in searching out and securing the de-funding of anti-workfare groups -- a step that raises serious legal and Constitutional questions -- than it has been to promote compliance with JTPA's statutory mandates.

We welcome these hearings, and additional Congressional oversight efforts that we hope will follow, as a means for helping DOL and JTPA get back on track towards the employment and training goals set by Congress. The nation's unemployed, and the State and local governments trying to assist them, require and deserve more effective federal agency support.

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interested persons to issues and options relating to the set-aside.

ADDRESS: Requests for copies, including self-addressed envelopes and/or mailing label, should be addressed to the Assistant Secretary of Labor for Employment and Training, U.S. Department of Labor, 601 D Street, NW., Room 9000, Washington, D.C. 20213. Attention: Patrick J. O'Keefe, Acting Administrator, Office of Strategic Planning and Policy Development.

FOR FURTHER INFORMATION CONTACT: Patrick J. O'Keefe, telephone: (202) 376–[illegible].

SUPPLEMENTARY INFORMATION: On October 13, 1982, the President signed the Job Training Partnership Act, Public Law 97–300. This statute includes amendments to the Wagner-Peyser Act (29 U.S.C. 49 et seq.) which, *inter alia*, established a statutory allocation formula that allots appropriations among the States based on their relative shares of civilian labor force and unemployment. The amendments also provide for the set-aside of up to three percent of funds appropriated to assure that each State will have staff and other resources sufficient to carry out employment service activities and related administrative and support functions on a Statewide basis (Section 6(b)(4) of the Act).

The options paper now being made available describes five options regarding the approach to allocating these set-aside funds. Comments on these, or other possible options, are being solicited at this time.

Signed this 22nd day of April, 1983.

Albert Angrisani,

Assistant Secretary of Labor.

[FR Doc. 83–[illegible] Filed 4–25–83; 8:45 am]

BILLING CODE [illegible]

Job Training Partnership Act; Proposed Secretary's Performance Standards and Reporting Requirements

AGENCY: Employment Training Administration, Labor.

ACTION: Notice.

SUMMARY: Section 106 of the Job Training Partnership Act (JTPA) requires the Secretary of Labor to prescribe performance standards for Title II–A and Title III programs. Section 165 of JTPA authorizes the Secretary to require each recipient to maintain records and submit reports regarding the performance of the programs. The Secretary's instructions for implementing the performance standards requirements and reporting provisions developed in response to Section 106 and 165 of JTPA are set forth below. The purpose of this notice is to advise the employment and training community that the Department has forwarded to the Office of Management and Budget "The Secretary's Performance Standards and Reporting Requirements" for JTPA Titles II and III for review under the requirements of the Paperwork Reduction Act. Upon completion of the review, the Department will notify the employment and training community of any changes or adjustments as a result of the review.

DATES: Comments must be submitted on or before May 26, 1983.

ADDRESS: Comments should be addressed to the Assistant Secretary of Labor for Employment and Training, U.S. Department of Labor, 601 D Street, N.W., Washingtgon, D.C. 20213. Attention: Ms. Kay Albright, Director, Office of Performance Management.

FOR FURTHER INFORMATION CONTACT: Ms. Kay Albright, Telephone (202) 376–[illegible].

SUPPLEMENTARY INFORMATION:

A. Purpose of the Performance Standards

The performance standards system is intended to be the cornerstone of a performance driven job training program. Performance standards will be used by Governors to make determinations about service delivery area (SDA) performance and to identify technical assistance needs, provide incentive grants, and impose sanctions.

B. Authority to Issue Performance Standards

Section 106 of the Act directs the Secretary to establish performance standards for the Title II–A adult and youth and Title III dislocated workers programs. The Secretary is further required at Section 106 of the Act to establish parameters within which each Governor may prescribe variations in the performance standards based on specific economic, geographic, and demographic factors within a State and the SDA's in a State, the characteristics of the population to be served, and the type of services to be provided.

C. Participatory Process

The Department established two distinct groups to assist in the development of the performance standards system. A Technical Workgroup was assembled to work with ETA staff members in drafting technical papers for the review and deliberation of the Department and an Advisory Committee. The Technical Workgroup consisted of staff members from service deliverers including Governors and other State staff, two regional offices, several offices from the national level, the Bureau of Labor Statistics, and the Office of the Assistant Secretary for Policy, Evaluation, and Research. This group met twice during the developmental stages of the JTPA initial performance standards process.

An Advisory Committee was established to review and comment on the technical workpapers prepared by ETA staff and the Technical Workgroup. The Advisory Committee included six State and five local program directors, two Regional Administrators, three congressional staff members, seven ETA officials, officials from the National Commission for Employment Policy, the Department of Health and Human Services, the Bureau of Labor Statistics, and the Women's Bureau, and representatives from the National Governors Association, the National Alliance of Business, the National Association of Counties, the U.S. Chamber of Commerce, the Council of Chief State School Officers and the U.S. Conference of Mayors. This group also met twice during the developmental stage of the JTPA performance standards process.

The two groups explored the various alternatives surrounding four major topics: (1) Selection of measures, (2) standard setting methodology, (3) application of standards, and (4) implications for reporting and recordkeeping.

D. Necessity for Reporting Requirements

Section 165(a)(2) of the Act authorizes the Secretary to require the recipients to maintain and submit reports regarding the performance of their programs. Section 106 of the Act requires the Secretary to establish standards for measures reflecting program termination outcomes (e.g., entered employment rate), post-program participant experience (e.g., amount of welfare reductions), and cost effectiveness (e.g., cost per earnings gains). The legislation also recognizes that States and SDA's have different economic conditions, population characteristics, and employment barriers. The Act permits Governors to prescribe variations in the standards, within parameters established by the Secretary, based on specific economic, geographic, and demographic factors, the characteristics of the population to be served, and the types of services to be provided.

Regression analysis has been chosen as the method for the Secretary to establish standards and set the parameters. It provides a mechanism for simultaneously determining the impact of multiple local factors on performance, enabling individual standards to be set for each SDA. After an exhaustive examination, it has been concluded that this is the most equitable and objective way to set performance standards.

The use of regression analysis, however, requires the reporting of SDA-level data to the Governor and from the Governor to the Secretary. Other methods were considered for collecting data to establish national performance models, but were rejected for technical reasons or because they were too costly. Two of the alternative methods considered were:

a. Limited reporting of State-level aggregate data and

b. National sampling of SDA-level participant records

From management, technical, and cost perspectives, Federal reporting of SDA-level data through the Governors provides the best approach for meeting the performance standards requirements of the Act. Therefore, SDA's will be required to submit to their Governors an annual report which includes the following types of information for adult, adult welfare, youth and dislocated worker terminees:

a. Participation and termination summary data;

b. Selected participant characteristics data on terminees;

c. Wage and welfare data, at termination;

d. Program cost data; and

e. Followup data (wage and welfare data collected 13 weeks after termination).

Followup data must be collected on all terminees who are adults, adult welfare, or dislocated workers.

The followup information must be collected via participant contact only. Sampling will be permitted if the respective terminee populations are large enough to provide estimates which meet minimum standards of statistical precision and confidence. These minimum standards require a sample which provides estimates which have a 95% confidence level and an expected error of no more than ± 10%. In addition, SDA's which choose to sample should design their efforts to achieve a minimum response rate of 70%.

E. OMB Submission

Accordingly, the document included at the appendix to this notice has been submitted to OMB for review.

Signed at Washington, D.C. this 19th day of April, 1983.

Albert Angrisani,

Assistant Secretary of Labor.

Appendix—the Secretary's Performance Standards and Reporting Requirements

I. Purpose

This issuance transmits to the Governors the Secretary of Labor's instructions for implementing the performance standards requirements and reporting provisions of the Job Training Partnership Act (JTPA).

II. Background

The Secretary is directed by Section 106 of JTPA to prescribe performance standards for adult, youth, and dislocated worker programs. The purpose of these standards is to provide the Governor with the basis for determining those service delivery areas (SDA's) entitled to rewards and to identify those warranting technical assistance or sanctions. Furthermore, such standards shall contribute to the overall goals of JTPA of increased employment and earnings and reduced welfare dependency. The approach taken by the Secretary in prescribing these performance standards is that experience with past performance is the most rational and objective basis for projecting future program potential. Furthermore, the determination of performance potential must be based on the differing local circumstances within which service deliverers must operate. This issuance provides detailed instructions on performance standards requirements. Before describing those requirements, the following summary presents the basic elements of the Secretary's Performance Standards procedures:

- *Measure Selection.* Seven performance measures have been selected for setting performance standards (Adults: Entered Employment Rate, Cost per Entered Employment, Average Wage at Placement, and Welfare Recipient Entered Employment Rate. Youth: Entered Employment Rate, Positive Termination Rate, and Cost per Positive Termination.) Out of the many program termination measures considered, these were judged to most closely track the legislative goals and, for six of the seven, there is data available under CETA to project performance. Each measures outcomes at termination. Post-program measures such as earnings gains cannot be initiated until there is a period of JTPA activity enabling a data base to be established on which to project performance.
- *The Secretary's Performance Standards.* For each measure, a Secretary's Performance Standard will be set which involves adjusting the prior performance period national average performance level for differing local circumstances. This adjustment systematically takes into account the impact of selected local factors based on an analysis of past performance in order to project future performance potential. The Secretary provides a "weight" for each factor to the Governor.

The "weight" is applied to the local planning data to project the SDA performance. In other words, if the unemployment rate is 5% points above the national average, the "weight" provided by the Secretary directs how much of an adjustment in expected performance should be made for that difference. The combined adjustments for each of the factors when applied to the national average performance for the measure project the SDA performance potential. This projected level is the Secretary's Performance Standard.

- *The Secretary's Parameters.* There may be reasons why the projected performance should be varied by the Governor. Not all factors which impact performance may have been included in the projection. Later information may be available. The Governor may vary the Secretary's Performance Standard within the parameters set by the Secretary for such reasons. The parameters are the upper and lower limits around the projected performance level within which the variance may be made. If the Governor chooses to vary the Secretary's Performance Standard then that becomes the SDA's Performance Standard.
- *Application of the Standards.* At the end of the performance period, it will be appropriate to update the factors used to project performance to reflect the actual circumstances within which the service deliverers operated. The Governor may also choose to again vary the "recalculated" Secretary's Performance Standard within the parameters. Once these steps are taken, the Governor can determine whether the standards were met and provide rewards, technical assistance, or sanctions as appropriate.

III. Instructions for Implementing Performance Standards

This section provides specific instructions to implement the elements described in Section II. The measures are specifically defined at A. and B. The procedures for calculating the Secretary's Performance Standards are described at C. 1. and 2. The Secretary's parameters are described at C.3., recalculation procedures at C.4., and procedures for calculating the "Entered Employment Rate for Welfare Recipients" are described at C.5. Part D. describes the use of performance standards. Part E. and F. describe requirements for dislocated workers and youth employment competencies.

A. Adult Performance Measures

Performance standards for adult outcomes resulting from Title IIA participation are established for the following four (4) measures (Definitions are included with reporting instructions):

1. *Entered Employment Rate*—Number of adults who entered employment as a percentage of the number of adults who terminated.
2. *Cost per Entered Employment*—Total expenditures for adults divided by the number of adults who entered employment.
3. *Average Wage at Placement*—Average wage for all adults who entered employment at the time of termination.
4. *Welfare Entered Employment Rate*—Number of adult welfare recipients who entered employment at termination as a percentage of the number of adult welfare recipients who terminated.

B. Youth Performance Measures

Performance standards for youth outcomes resulting from Title IIA participation are established for the following three (3) measures:

1. *Entered Employment Rate*—Number of youth who entered employment at termination as a percentage of the number of youth who terminated.
2. *Positive Termination Rate*—Number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminated.
3. *Cost Per Positive Termination*—Total expenditures for youth divided by the number of youth having a positive termination.

C. Secretary's Performance Standards for Adults and Youth

The following describes the methodology which Governors must use to calculate Secretary's Performance Standards for each SDA for 6 of the 7 measures defined above. The exception is the adult welfare entered employment rate. The methodology for calculating the Secretary's Performance Standard for this measure is in the next section. For the remaining measures, the methodology described below will enable Governors systematically and objectively to take into account the varying influence that participant characteristics, economic conditions, and other factors have on SDA performance expectation. Six separate Performance Standards Worksheets (PSW) have been developed to assist in calculating SDA Performance Standards (Attachment #1). The worksheets include for each measure, as appropriate, the information necessary for calculating individual SDA Performance Standards. It should be noted that the worksheets are not required, but merely represent a suggested format for completing the necessary calculations. The calculation steps themselves, however, are required. Instructions for completing the required calculations are included in this attachment.

1. *Overview.*—In accordance with Section 106(c) of JTPA, the data base accumulated under the Comprehensive Employment and Training Act (CETA) will be used to establish performance standards for the Title IIA programs. Data covering FY 1982 were used to identify local factors and determine the direction and magnitude of their influence on performance expectations for each of the appropriate measures identified previously. An analytical model was employed to determine the relationship between these factors and performance outcomes. The analysis compared actual prime sponsor performance with actual local factors in the prior performance period. The model identified 15 local factors which influence performance, including selected participant characteristics and economic conditions, as well as the average weeks participated in the program. The number of local factors found to influence performance varies depending on the particular performance measure as reflected in the PSWs. Importantly, the model is able to take these local factors into account simultaneously to explain a substantial portion of variation in performance among service deliverers. Each factor, therefore, has a "weight" which indicates its expected impact. It should be recognized, however, that some factors which are directly under the control of SDAs, such as differences in management practices, are inappropriate and are not accounted for in the analytical model.

2. *The Process for Determining Expected Levels of Performance—The Secretary's Performance Standards.*—The following is an explanation of the process that Governors must use to determine the SDA projected level of performance for each of the six measures. The projected levels will constitute the Secretary's Performance Standards. (The step b[illegible]ep instructions for the calc[illegible]ions are included in Attachment #1.)

As noted above, particular circumstances which may affect performance or the types of participants being served vary considerably from area to area. For performance standards to be equitable, they must take these local differences into consideration. The first step then is to determine the planned values for each of the local factors found to influence performance.

After the SDA planning values are determined for the local factors (e.g., what the percent of welfare participants will be of all participants planned to be terminated), the national average value for each factor is subtracted from it. The difference between the local value and the national average is then multiplied by the weight of that factor to determine what the anticipated local impact on performance will be for that unique level of planning. This is determined for all the factors and added up to estimate the total affect these local factors will have on performance expectations. This combined influence is then applied to the national average performance level for the measure to predict local performance. That predicted performance level becomes the Secretary's Planned Performance Standard for that measure for that SDA.

For the four outcome measures, SDA planned or actual outcomes would meet or exceed the Secretary's Performance Standards if the planned or actual outcome was at or above the Secretary's Performance Standard. For the two cost measures, SDA planned or actual outcomes would meet or exceed the Secretary's Performance Standard if the costs were at or below the Secretary's Performance Standard.

3. *Secretary's Parameters.*—Section 106(e) of JTPA allows each Governor to vary the Secretary's Performance Standards for individual SDAs within parameters established by the Secretary. It si recognized that the analytical model used to establish the Secretary's Performance Standards for the various outcome and cost measures identified above do not account for all factors which affect performance. Moreover, it is acknowledged that specific and exceptional local conditions may occur which have a positive or negative influence on an SDA's ability to achieve the Secretary's Performance Standards. Therefore, the Governors have the discretion to raise or lower the Secretary's Performance Standards calculated during the planning process

to review SDA planned performance and/or recalculated at the end of the performance period to assess actual SDA performance. These adjustments, if applied, must be based on unique opportunities or problems present in an SDA's jurisdiction and not already reflected in the analytical model used to determine the Secretary's Performance Standard for each measure. For example, a plant may be scheduled to close which could significantly impact unemployment levels and performance potential.

If the Governor does not vary the standard within the parameters, then the Secretary's Performance Standard becomes the SDA Performance Standard. If the Governor varies the standard, then the adjusted level becomes the SDA Performance Standard.

In addition, adjustments to the Secretary's Performance Standards and the factors used in making these adjustments must be documented and reported to the Secretary, as part of the Governor's Coordination and Special Services Plan in accordance with Section 121(b)(3) of the Act. The Governor shall report to the Secretary the factors he intends to use in varying the Secretary's standards in setting SDA standards for the upcoming program period of JTPA. These factors should be announced in advance and consistently applied. The Governor shall also report the extent of adjustment made and the reasons for the adjustment during the current period.

Furthermore, the Governor may only vary the Secretary's Performance Standards within the parameter limits set by the Secretary. Such ranges are set for each standard so that if SDA's perform in the same manner as prime sponsors did through FY 1982, 25% of the SDAs would fail to reach the lower side of the ranges and 25% of the SDAs would exceed the higher side of the ranges.

4. *End-of-Performance-Period Recalculation of Secretary's Performance Standards.*—At the end of performance period, the steps in 2. above must be repeated to calculate the Secretary's Final Performance Standard for each of the six measures when JTPA performance data is available. The recalculation will be based on actual data for participant characteristics, average weeks participated, and updated economic conditions. The recalculated standards constitute the Secretary's Final Performance standards for each SDA together with any variations applied by the Governors in accordance with the Section 106(e). These final standards are the basis for the Governor to issue rewards and sanctions. The information needed to be used with SDA planning data or actual data to calculate the Secretary's Planned and/or Final Performance Standards is preprinted on the worksheets in Attachment #1.

5. *Calculation of Secretary's Performance Standards for the Adult Welfare Entered Employment Rate.*—An adequate data base is not available to enable construction of an analytical model for use in establishing the Secretary's Planned Performance Standard for this measure. Consequently, an alternative methodology must be used. Attachment #2 contains for each CETA prime sponsor and each State based on FY 1982 CETA data:

— The ratio of the welfare recipient entered employment rate to the total entered employment rate.

The information in Attachment #2 must be used in conjunction with the Secretary's Planned Performance Standard for the adult entered employment rate calculated from Step (2) above as follows:

a. Where the jurisdiction of the SDA under JTPA is the same as that of a prime sponsor under CETA during FY 1982, multiply the appropriate prime sponsor ratio shown in Attachment #2 by the Secretary's Performance Standard for the adult entered employment rate calculated from Step (2) above (e.g., Prime Sponsor Ratio of .55 times Secretary's Standard for the adult entered employment rate of 50% equals the Secretary's Standard for the Welfare Entered Employment Rate of 27.5%).

b. Where the jurisdiction of the SDA under JTPA is not the same as that of a prime sponsor under CETA during FY 1982, multiply the appropriate State ratio shown in Attachment #2 by the Secretary's Performance Standard for the adult entered employment rate calculated from Step (2.) above.

The same calculations must be competed at the end of the performance period to calculate the Secretary's Final Performance Standard for the adult Welfare Entered Employment Rate. Attachment #1 contains a worksheet to assist in completing these calculations for this measure. The Secretary's parameters also apply to this measure in the same manner as they apply to other measures.

6. *Calculation Instructions for Puerto Rico, Virgin Islands, Guam and the Trust Territories.*— The calculation steps described in the preceding items 1. through 5. shall not be used for setting SDA standards for these jurisdictions since the influence of local factors could not be adequately measured in their unique circumstances. Standards shall be set in these jurisdictions using national average performance levels as the Secretary's Standard for each measure. Such standards may be varied based on the influence of local economic, geographic and demographic factors and the characteristics of the participants, in accordance with Section 106(e) of the Act.

D. Use of Performance Standards

The following describes how SDA Performance Standards established by the Governors are to be used in the review of SDA job training plans, and for judging SDA performance accomplishments for the purposes described at Section 106 (h) and 202 (b)(3) of the Act.

1. *Review of SDA Job Training Plan*— In accordance with Sections 104 (b) (4) and 105 (b) (1) (D) of the Act, the Governor should ensure that SDA planning levels contained in the job training plan for each of the seven measures are consistent with the appropriate planned performance standard.

2. *Final Year-End Performance Assessment.*—Governors compare actual SDA performance with the SDAs Final Performance Standard for each measure to determine appropriate use of technical assistance/sanctions and rewards in accordance with the provision of Sections 106(h) and 202(b)(3) of the Act, respectively. It should be noted, however, that Section 181(j)(3) of the Act does provide a grace period for the application of sanctions based on performance standards. No SDA is to be penalized for not meeting performance standards during the initial program period beginning October 1, 1983 and ending June 30, 1984.

As indicated previously, SDA's are eligible for performance incentive funds if they exceed the Secretary's Final Performance Standards varied by the Governor within the Secretary's parameters. Since there are seven standards for Title IIA programs, an SDA shall have to meet five of the seven standards to be entitled to incentive funds. The adult enterrd employment rate, welfare recipient entered employment rate, and youth positive termination rate must be among the five.

E. Dislocated Workers

Title III–Section 106(g) of the Act requires the Secretary to prescribe performance standards based on placement and retention in unsubsidized jobs for the State dislocated worker programs. Because performance data will not be available until during FY 1985, the Secretary defers the prescribing of performance standards until such data is available. Instead, Governors are directed to set performance "goals", for the State's dislocated worker program. The goals set by the Governor will not be subject to review by the Secretary. Experience accumulated during the initial program period and after will provide a base for establishment of standards for subsequent periods. However, at a minimum, States are to use the performance measures prescribed by the Secretary in setting goals. These measures are:

- *Entered Employment Rate*—Number of individuals who entered employment as a percentage of the number of individuals who terminated.
- *Cost Per Entered Employment*—Total Federal expenditures divided by the number of individuals who entered employment.

F. Youth Employment Competencies.

In accordance with Section 106(b)(2)(A) of the Act and 20 CFR 629.46(a) the Secretary's standards for youth employment competencies prescribe the framework within which an SDA's youth employment competencies system shall be developed. The framework includes the following:

1. Competencies shall be developed within three categories:

- *Basic Educational Skills*—including reading, writing and computational skills;
- *Job Specific Skills*—including knowledge and skills normally required to carry out entry-level tasks of a specific occupational or cluster of occupations; and
- *Pre-employment and work maturity skills*—including those skills not covered above needed to look for, obtain, and retain a job.

2. A competency system shall include:

- A deficiency identification process to determine which element or elements are appropriate for the youth; and
- A testing/assessment process to determine that the youth has attained the competencies specified for him or her.

The following provisions apply to SDA youth employment and competency systems:

—All participants age 21 and under shall be included in the youth competencies system; and

—A youth need only be included in those competency categories for which he or she has a knowledge deficit.

A technical assistance guide will be issued to assist Governors and SDAs in implementing the youth employment competencies system.

IV. JTPA Annual Status Report (ASR)

1. *Purpose.* The JTPA Annual Status Report (ASR) displays cumulative data on participation, termination, performance measures and the socio-economic characteristics of all terminees on an annual basis. The information will be used to determine levels of program service and performance measures. Selected information will be aggregated to provide quantitative program accomplishments on a local, State, and national basis.

2. *General Instructions.* A single ASR for Title III (Column D) programs only will be submitted by the Governor on a Statewide basis. Also, a separate ASR for Title II–A (Columns A–C) programs only will be submitted for each Service Delivery Area (SDA) designated by the Governor.

Note.—Exclude information for Title II–B, Summer Youth Employment and Training Program (SYETP), from the ASR. (Data for Title II–B activity is to be submitted on the appropriate Statewide JTPA Quarterly Status Reports.)

Each reporting period begins on the start date of each JTPA program year, as stated in Section 161 of the Act. Reports are due in the national office no later than 45 days after the end of each program year. Three copies of the ASR are to be provided to: Employment and Training Administration, U.S. Department of Labor, Attn: TSVR, 601 D Street NW., Washington, D.C. 20213.

An additional copy of the ASR is to be provided to the appropriate Regional Administrator for Employment and Training in the DOL regional office that includes the State in which the JTPA recipient is located.

3. *Facsimile of Form.* See the following page.

BILLING CODE [illegible]

U.S. DEPARTMENT OF LABOR
Employment and Training Administration

JTPA
ANNUAL STATUS REPORT

a. STATE/SDA NAME AND ADDRESS

b. SDA NO. OR STATEWIDE

c. REPORTING PERIOD
From
To

FOR FEDERAL OFFICE USE ONLY

d. TYPE OF PROGRAM
("X" appropriate box(es))

1. ☐ Title II-A
2. ☐ Title III
3. ☐ Other (specify) ______

I. PARTICIPATION AND TERMINATION SUMMARY	TOTAL ADULTS (A)	ADULTS (WELFARE) (B)	YOUTH (C)	DISLOCATED WORKERS (D)
A. TOTAL PARTICIPANTS				
B. TOTAL TERMINATIONS				
1. Entered Unsubsidized Employment				
a. Entered Registered Apprenticeship Pgm.				
b. Entered Armed Forces				
2. Youth Employability Enhancement Terminations				
a. Entered Non-Title II Training				
b. Returned to Full-Time School				
c. Age 14 - 15 Completed Program Objectives				
d. Completed Major Level of Education				
3. OTHER TERMINATIONS				

LINE NO.	II. TERMINEE PERFORMANCE MEASURES INFORMATION A. CHARACTERISTICS OF TERMINEES					
1	SEX	Male				
2		Female				
3	AGE	14 - 15				
4		16 - 17				
5		18 - 21				
6		22 - 44				
7		45 - 54				
8		55 and Over				

e. SIGNATURE AND TITLE	f. DATE SIGNED	g. TELE. NO.

PROPOSED ETA [illegible] (Dec. 1982)

a. STATE/SDA NAME AND ADDRESS	b. GRANT NO.	c. REPORT PERIOD From / To	d. TYPE OF PROGRAM

LINE NO.	II. TERMINEE PERFORMANCE MEASURES INFORMATION - Continued		TOTAL ADULTS (A)	ADULTS (WELFARE) (B)	YOUTH (C)	DISLOCATED WORKERS (D)
9	EDUCATION STATUS	School Dropout				
10		Student (High School or Less)				
11		High School Graduate or Equivalent (No Post-High School)				
12		Post-High School Attendee				
13	FAMILY STATUS	Single Parent with Dependent(s) Under Age 6				▨
14		Single Parent with Dependent(s) Age 6 through 17				▨
15	RACE/ETHNIC GROUP	White (Not Hispanic)				
16		Black (Not Hispanic)				
17		Hispanic				
18		American Indian or Alaskan Native				
19		Asian or Pacific Islander				
20	OTHER BARRIERS TO EMPLOYMENT	Limited English Language Proficiency				
21		Handicapped (Adult/Youth)				
22		Offender				
23	U.C. STATUS	Unemployment Compensation Claimant		▨	▨	
24		Unemployment Compensation Exhaustee		▨	▨	
25	LABOR FORCE STATUS	Unemployed: 1 - 14 Weeks of Prior 26 Weeks				
26		Unemployed: Long-Term - 15 or More Weeks of Prior 26 Weeks				
27		Not in Labor Force				
28		Average Weeks Participated				
29		Youth Welfare Recipient	▨	▨		▨
	B. WAGE AND WELFARE DATA		▨	▨	▨	▨
30		No. Terminees Entered Unsubsidized Employ. (With Preprogram Hourly Wage)				▨
31		Average Hourly Wage in Last Job (13 Weeks Preprogram)				▨
32		Average Hourly Wage at Termination (Terminees with Preprogram Hourly Wage)				▨
33		Average Hourly Wage at Termination (Terminees without Preprogram Hourly Wage)				▨
34		Average Monthly Welfare Grant at Time of Eligibility Determination	▨		▨	▨

Page 2 of 3 Pages

a. STATE/SDA NAME AND ADDRESS	b. GRANT NO.	c. REPORT PERIOD From To	d. TYPE OF PROGRAM

LINE NO.	III. PROGRAM COSTS	TOTAL ADULTS (A)	ADULTS (WELFARE) (B)	YOUTH (C)	DISLOCATED WORKERS (D)
35	TOTAL PROGRAM COSTS		▨		
	IV. FOLLOWUP INFORMATION	▨	▨	▨	▨
36	Potential Total Contacts			▨	
37	Potential Sample Contacts			▨	
38	Responses			▨	
39	Total Employed (At Time of Contact)			▨	
40	Total Employed (Sometime during First 13 Weeks after Termination)			▨	
41	Average Hourly Wage (13 Weeks Preprogram)			▨	▨
42	Average Hourly Wage (13 Weeks after Termination)			▨	▨
43	Average Weeks Worked (13 Weeks Preprogram)			▨	
44	Average Weeks Worked (13 Weeks after Termination)			▨	
45	Average Hours Worked in Last Job (13 Weeks Preprogram)			▨	
46	Average Hours Worked in Last Job (13 Weeks after Termination)			▨	
47	Individuals Off Welfare (13 Weeks after Termination)	▨		▨	▨
48	Individuals with Reduced Welfare (13 Weeks after Termination)	▨		▨	▨
49	Average Welfare Grant Reduction (13 Weeks after Termination)	▨		▨	▨

REMARKS

Page 3 of 3 Pages

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4. *Instructions for Completing the JTPA Annual Status Report.*

a. *SDA Grant Recipient's Name and Address.* Enter the name and address of the SDA Grant Recipient.

b. *SDA Number or Statewide.* Enter this information as provided by the Governor.

c. *Reporting Period.* Enter in "From" the beginning date of the designated JTPA program year and enter in "To" the ending date of the program year.

d. *Type of Program.* Check the appropriate box(es) and specify as indicated. Program Types are: II–A (Adult and Youth Program); III (Dislocated Workers Program); Other (Specify).

e. *Signature and Title* (at bottom of the page) The authorized official of the Governor signs here and enters his other title.

f. *Date Signed.* Enter the date the report was signed by the authorized official.

g. *Telephone Number.* Enter the area code and telephone number of the authorized official.

5. *General Information.* The column breakouts are based strictly on age rather than on program strategy. For purposes of the ASR, the adult and adult welfare columns will include terminees age 22 years and older. The youth column will include terminees who were age 14–21 at the time of eligibility determination. The dislocated workers column may include adults and youth, as applicable.

Data reported should be based on information collected at the time of intake with two exceptions—immediate post program outcomes and followup data collected 13 weeks after termination. In order to facilitate the reporting of the immediate post program outcomes and the followup sections of the ASR, the Governor should consider requiring his/her SDA's to collect the 13 weeks pre-program information at the time of eligibility determination. (See Lines 30–34, 41, 43 and 45.) Refer to the participant Record for further information.

CHARACTERISTICS INFORMATION OBTAINED ON AN INDIVIDUAL AT THE TIME OF ELIGIBILITY DETERMINATION FOR THE RECIPIENT'S JTPA PROGRAM SHOULD NOT BE UPDATED WHEN THE INDIVIDUAL TERMINATES FROM THE JTPA PROGRAM.

Column Headings

Column A *Total Adults*

This column will contain an entry for each appropriate item for all adult participants in Title II–A only.

Column B *Adults (Welfare)*

This column will contain an entry for each appropriate item for adult participants in Title II–A who were welfare recipients or whose family received cash payment under AFDC (SSA Title IV), General Assistance (State or local government), or the Refugee Assistance Act of 1980 (PL 96-212) at the time of JTPA eligibility determination. For performance standards purposes, exclude recipients of SSI (SSA Title XVI) from entries in Column B.

Note.—Column B is a sub-breakout of Column A; therefore, Column B should be less than or equal to Column A, except for Lines 34, 47–49.

Column C *Youth*

This column will contain an entry for each appropriate item for all youth participants in Title II–A only.

Column D *Dislocated Workers*

This column will contain an entry for each appropriate item for all participants in Title III who were determined to be eligible dislocated workers.

Note.—All information regarding a given participant must be entered in the same column.

Columns A, B, and C apply to Title II–A only.

Column D applies to Title III only.

Section I—Participation and Termination

Summary

Section I displays the program's accomplishments in terms of the total cumulative number of actual participants in the program and the number and types of terminations from the program, as of the end of the reporting period.

Entries for items I.A and I.B are cumulative and types from the beginning of the program year through the end of the reporting period.

Item I.A. Total Participants

Enter the total number of participants who are or were in the program through the end of the reporting period, including both those on board at the beginning of the designated program year and those who have entered during the program year.

"Participant" means any individual who has: (1) Been determined eligible for participation upon intake; and (2) Started receiving subsidized employment, training, or services (except post-termination services) funded under the Act following intake, except for an individual who receives only outreach and/or intake and assessment services.

Item I.B. Total Terminations

Enter the total number of participants terminated from the program for any reason from the beginning of the program year through the end of the reporting period. This item is the sum of items I.B.1. through I.B.3.

"Termination" means the separation of a participant from a given title of the Act who is no longer receiving employment, training or services (except post-termination services) funded under that title.

Note.—Individuals may continue to be considered as participants for a period of 90 days after last receipt of employment or training funded under a given title.

Item I.B.1. Entered Unsubsidized Employment

Enter the cumulative number of terminees who entered (through the efforts of the subrecipient or otherwise) full- or part-time unsubsidized employment through the end of the reporting period. Unsubsidized employment means employment not financed from funds provided under the Act. (For JTPA reporting purposes, this term includes entry into the Armed Forces, entry into employment in a registered apprenticeship program, and terminees who became self-employed.)

Item I.B.1.a. Entered Registered Apprenticeship Program

Enter the cumulative number of terminees who entered registered apprenticeship programs following termination from the program. This item is a sub-breakout of Item I.B.1.

Item I.B.1.b. Entered Armed Forces

Enter the cumulative number of terminees who entered the Armed Forces following termination from the program. This item is a sub-breakout of Item I.B.1.

Item I.B.2. Youth Employability Enhancement Terminations

Enter the cumulative number of youth participants who were terminated under one of the Youth Employability Enhancements through the end of the report period. "Youth Employability Enhancement" means an outcome for youth, other than entered unsubsidized employment, which is recognized as enhancing long-term employability and contributing to the potential for a long-term increase in earnings and employment. Outcomes which meet this requirement shall be restricted to the following: (1) Entered Non-Title II Training; (2) Returned to Full-Time School; (3) Age 14–15 Completed Program Objectives; or (4) Completed Major Level of Education.

Note.—For reporting purposes, a youth shall not be counted in this item, if he/she entered unsubsidized employment, and shall be counted in only one of these categories, even though more than one may have been achieved.

Item I.B.2.a. Entered Non-Title II Training

Enter the cumulative number of youth terminees who entered an employment/training program not founded under Title II of the JTPA. This item is a sub-breakout of Item I.B.2.

Item I.B.2.b. Returned to Full-Time School

Enter the cumulative number of terminees who returned to full-time school if, at the time of eligibility determination the participant was not attending school and had not obtained a high school diploma or equivalent. This item is a sub-breakout of Item I.B.2.

Item I.B.2.c. Age 14–18 Completed Program Objectives

Enter the cumulative number of terminees who completed program objectives as defined in approved exemplary youth project plans if, at the time of entry, the participant was less than 18 years of age. This item is a sub-breakout of Item I.B.2.

I.B.2.d Completed Major Level of Education

Enter the cumulative number of terminees who completed, during enrollment, a level of educational achievement which had not been reached at the time of entry. Levels of educational attainment are elementary, secondary, and post-secondary. This item is applicable only for those not in school at time of entry into the program. This item is a sub-breakout of Item I.B.2.

Note.—The sum of Items I.B.2.a. through I.B.2.d. in Column B should equal Item I.B.2., Youth Employability Enhancement Terminations, in that column.

Item I.B.3. Other Terminations

Enter the cumulative number of participants who were terminated for reasons other than those in Items I.B.1. and I.B.2.—both positive and negative—through the reporting period.

Section II—Terminee Performance Measures Information

Section II displays performance measures/parameters information. As indicated previously, characteristics information for terminated participants is as of the time of eligibility determination for the recipient's JTPA program. Other information is as specified (e.g., "Unemployed 1–14 Weeks of Prior 26 Weeks" means the cumulative number of terminees who were unemployed 1–14 weeks during the 26 weeks prior to eligibility determination).

References to items in the Participant Record are to the individual recordkeeping document to be provided by DOL in a Technical Assistance Guide (TAG). Governors have the option of using the record, as outlined in the TAG, or may develop any other record which meets the requirements of Section 629.35(c) and (d) of the JTPA Regulations.

Line Item Definitions and Instructions

Item II.A Characteristics of Terminees

Sex

Line 1 Male
Line 2 Female

Distribute the terminees according to Sex. (Item A.20. of the Participant Record). The sum of Lines 1 and 2 in each column should equal Item I.B. in that column.

Age

Line 3 14–15
Line 4 16–17
Line 5 18–21
Line 6 22–44
Line 7 45–54
Line 8 55 and Over

Distribute the terminees according to Age. (Item A.8. of the Participant Record). The sum of Lines 3 through 8 in each column should equal Item I.B. in that column.

Education Status

Line 9 School Dropout
Line 10 Student (High School or less)
Line 11 High School Grad. or Equiv. (No Post-High School)
Line 12 Post-High School Attendee

Distribute the terminees according to Education Statutes. (Item A.21. of the Participant Record). The sum of Lines 9 through 12 in each column should equal Item I.B. that column.

Family Status

Line 13 Single Parent with Dependent(s) Under Age 6
Line 14 Single Parent with Dependent(s) Ages 6 thru 17

Distribute the terminees, by column, if either of the above Family Status classifications apply (Item A.10. of the Participant Record).

Note.—A terminee who is a single parent and has dependent children who are over *and* under age 6 should be included in the entry for Line 13 only.

Race/Ethnic Group

Line 15 White (Not Hispanic)
Line 16 Black (Not Hispanic)
Line 17 Hispanic
Line 18 American Indian or Alaskan Native
Line 19 Asian or Pacific Islander

Distribute the terminees according to the Race/Ethnic Groups listed above. For purposes of this report, Hawaiian Natives are to be recorded as "Asian or Pacific Islander" (Item A.22. of the Participant Record). The sum of Lines 15 through 19 in each column should equal Item I.B. in that column.

Other Barriers to Employment

Line 20 Limited English-Language Proficiency
Line 21 Handicapped (Adults/Youth)
Line 22 Offender

Enter the terminees, by column, for as many of the above Barriers to Employment in Lines 20 through 22 as apply (Item A.23. of the Participant Record).

Unemployment Compensation Status

Line 23 Unemployment Compensation Claimant
Line 24 Unemployment Compensation Exhaustee

Enter the terminees, by column, if either of the above Unemployment Compensation classifications apply (Item A.18. of the Participant Record).

Labor Force Status

Line 25 Unemployed: 1–14 Wks. of Prior 26 Wks.
Line 26 Unemployed: Long-term—15 or More Wks. of Prior 26 Wks.
Line 27 Not in Labor Force

Distribute the terminees by column, if any of the Labor Force Status (Item A.17. of the Participant Record) classifications apply.

Line 28 Average Weeks Participated

Entered the average number of weeks of participation in the program for all terminees.

To calculate this entry: Count the number of days participated for each terminee, including weekends, from his/her date of entry into the program until his/her termination date. Divide this result by 7. This will give the number of weeks participated for that terminee.

Sum all the terminees' weeks of participation and divide the result by the number of terminees, as entered (by column) in Item I.B.

Line 29 Youth Welfare Recipient

Enter the number of youth terminees who were welfare recipients or whose family received cash payments under AFDC (SSA Title IV), General Assistance (State or local government), or the Refugee Assistance Act of 1980 (P.L. 96–212) at the time of JTPA eligibility determination. For performance standards purposes, *exclude* recipients of SSI (SSA Title XVI) from entries for Line 18.

Item II.B. Wage and Welfare Data

Line 30 No. of Terminees Entered Unsubsidized Employment (For Terminees with Preprogram Hourly Wage)

Enter the number of terminees who entered unsubsidized employment at termination and who had a preprogram hourly wage (i.e., had held a job sometime during the 13 weeks prior to eligibility determination).

Line 31 Average Hourly Wage in Last Job (13 Weeks Preprogram)

Enter the average hourly wage for the last job held during the 13 weeks prior to eligibility determination for the total number of terminees shown on Line 30 above (by column).

To calculate this entry: Sum the hourly wage for the last job held during the 13 weeks prior to eligibility determination for all the terminees shown on Line 30 above (by column). Divide the result by the number of terminees shown on Line 30 above (by column).

Line 32 Average Hourly Wage at Termination (For Terminees with Preprogram Hourly Wage)

Enter the average hourly wage at termination for the total number of terminees shown on Line 30 above (by column).

To calculate this entry: Sum the hourly wage at termination for all the terminees shown on Line 30 above (by column). Divide the result by the number of terminees shown on Line 30 above (by column).

Line 33 Average Hourly Wage at Termination (For Terminees with Preprogram Hourly Wage)

Enter the average hourly wage at termination for terminees who entered unsubsidized employment and who had no preprogram hourly wage (i.e., had not held a job sometime during the 13 weeks prior to eligibility determination).

To calculate this entry: Subtract the entry for Line 30 in each column from the entry for Item I.B.1 of Section I in that column. This will give the number of terminees who had no preprogram hourly wage. Sum the hourly wage at termination for such terminees. Divide the result by the number of terminees who had no preprogram hourly wage.

Line 34 Average Monthly Welfare Grant (At Time of Eligibility Determination)

Enter the average monthly welfare grant for all terminees who were welfare recipients or whose family received cash payments under AFDC, General Assistance, or the Refugee Assistance Act of 1980 at the time of eligibility determination. For performance standards purposes, exclude recipients of SSI from entries in Column B.

To calculate this entry: Sum the average monthly welfare grant for each terminee who was a welfare recipient or whose family received cash payments, as defined above, at the time of eligibility determination. Divide the result by the number of terminees shown in Item I.B., Column B.

Note.—Since followup is required for all terminees, it is strongly encouraged that the 13 weeks pre-program information be collected at the time of eligibility determination in order to facilitate the matching of followup data with required pre-program data. Refer to the Participant Record for further information.

Section III—Program Costs

Line 35 Total Program Costs

Enter the total accrued expenditures, through the end of the reporting period, of the funds allocated to SDAs under Section 202(a) of the Act or otherwise distributed by the Governor to SDA's under Section 202(b)—Performance incentives—for the Title II–A program in Columns A and C, as appropriate, for all participants served. Enter the total accrued expenditures, through the end of the reporting period, of Title III funds received by the Governor under Section 301 of the Act in Column D only, for all participants served.

Note.—Entries will be made to the nearest dollar. The ASR program cost data will be compiled on an accrual basis. If the recipient's accounting records are not normally maintained on an accrual basis, the accrual information should be developed through an analysis of the records on hand or on the basis of best estimates.

Section IV—Followup Information

Note.—This information must be obtained for all terminees. If the terminee populations are not large enough to use sampling (see the next section for further details), by means of participant contact methods only. Information required concerning terminees who had and did not have pre-program wages will be used for establishing further performance standards.

Line 36 Potential Total Contacts

Enter the total number of individuals for whom followup is required (if sampling is not used) and whose followup period ends within the reporting period. Individuals who terminate during the previous reporting period, but whose followup period ended during the current reporting period, are include in the entry for Line 36.

Line 37 Potential Sample Contracts

When sampling is used, enter the number of individuals in the sample in Line 37. Otherwise, enter zero for this line. (See the following section for the appropriate sample sizes.)

Line 38 Responses

Enter the number of individuals (of those entered in Line 36 or 37, as appropriate) for which all required followup information has been obtained.

Line 39 Total Employed (At Time of Contact)

Enter the number of individuals who were in unsubsidized employment at the time of contact (13 weeks after termination).

Line 40 Total Employed (Sometime During the First 13 Weeks after Termination)

Enter the number of individuals who were at time of contact, or had been sometime during the 13 weeks after termination, in unsubsidized employment.

Line 41 Average Hourly Wage (13 Weeks Preprogram)

Enter the average hourly wage for the last job held, if any, during the 13 weeks prior to eligibility determination for individuals who terminated during the report period, and for whom followup responses have been obtained (see entry for line 40).

To calculate this entry: Sum the last hourly wage for the last job held during the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40 (by column). Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no preprogram wage, enter zero in the summation.

Line 42 Average Hourly Wage (13 Weeks after Termination)

Enter the average hourly wage for individuals who were, or had been, in unsubsidized employment sometime during the first 13 weeks after termination, who terminated during the report period, and for whom followup responses have been received (see entry for Line 40).

To calculate this entry: Sum the last hourly wage for the last job held during the 13 weeks after termination for each of the individuals shown in the entry for Line 40 (by column). Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 43 Average Weeks Worked (13 Weeks Preprogram)

Enter the average number of weeks worked in the 13 weeks prior to eligibility determination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of weeks worked in the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no preprogram wage, enter zero in the summation.

Line 44 Average Weeks Worked (13 Weeks after Termination)

Enter the average number of weeks worked in the 13 weeks after termination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom follow-up responses have been obtained.

To calculate this entry: Sum the total number of weeks worked in the 13 weeks after termination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 45 Average Hours Worked—Last Job (13 Weeks Preprogram)

Enter the average number of hours worked during a week for the last job held during the 13 weeks prior to eligibility determination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of hours usually worked during *a week* for the last job held during the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no preprogram wage, enter zero in the summation.

Line 46 Average Hours Worked-Last Job (13 Weeks after Termination)

Enter the average number of hours worked during a week for the last job held during the 13 weeks after termination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of hours usually worked during a week for the last job held during the 13 weeks after termination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 47 Individuals Off Welfare (13 Weeks After Termination)

Enter the number of individuals who were welfare recipients at the time of termination from the program, and who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination, and who were no longer welfare recipients.

Line 48 Individuals with Reduced Welfare (13 Weeks after Termination)

Enter the number of terminees, who were welfare recipients at the time of termination from the program, and who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination, and who were receiving reduced welfare grants.

Line 49 Average Welfare Grant Reduction (13 Weeks After Termination)

Enter the total reduction in the monthly welfare grant(s) 13 weeks after termination for all individuals off welfare and all those receiving reduced grants who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination.

To calculate this entry: Sum the monthly grant reduction for each terminee of welfare or whose grant has been reduced (see entries for Lines 47 and 48). Divide this result by the total number of terminees included in the entries for Lines 47 and 48.

Note.—Again, it is strongly encouraged that all information requested concerning preprogram experience be collected for all participants at the time of eligibility determination in order to facilitate the matching of followup data to required preprogram data.

V. Use of Sampling To Obtain Followup Information

As indicated in the reporting instructions, the necessary participant followup information for all adult (AD) terminees, adult welfare (WR) terminees, and/or dislocated workers (DW) terminees, may be based on an annual sample drawn at random. Where sampling is used to obtain this information, SDA's will be expected to establish a system which provides accurate and reliable data that are representative of the followup universe. Consequently, it is necessary to have a system which ensures consistent random identification of sample participants throughout the performance period. Furthermore, the system must be structured to permit the matching of intake records with termination and followup records to produce the appropriate preprogram, termination, and postprogram data that must be reported for the sample population. In addition the system should facilitate prompt contact of sample participants once their followup period is completed (i.e., 13 weeks after the date of termination). This will necessitate access to current participant locator information. It is, therefore, important for SDA's to update locator information at time of termination for each participant who will be in the sample. This should include the participant's address and telephone number, as well as telephone numbers of relatives, friends, and/or neighbors. Oftentimes participants change residence after terminating from the program. Additional contact information will be extremely helpful in locating individuals in this instance.

However, the use of sampling will depend on whether the respective terminee populations are large enough to provide estimates which meet minimum standards of statistical precision and confidence. These minimum standards require a sample which provides estimates that have a 95 percent confidence level and an expected error of no more than ±10 percent. In addition, SDA's that choose to sample should design their efforts to achieve a minimum response rate of 70 percent.

Based on national estimates of means and standard deviations of earnings and welfare payments from the Continuous Longitudinal Manpower Survey (CLMS), the following sample sizes will be necessary to meet the appropriate satistical specifications:

AD terminees—396
WR terminees—321
DW terminees—321

If the number of individuals for whom followup is required and whose followup period ends within the reporting period is less than the required sample sampling cannot be used to obtain participant followup information.

In such cases, followup information must be obtained for all the appropriate terminees. Otherwise, the sample sizes noted above are adequate to provide acceptable estimates within the minimum sampling standards for all terminee populations.

The required sample sizes shown above assume that independent "AD terminees", "WR terminees", and "DW terminees" samples will be drawn randomly. In order to select terminees for followup, first compute the proportion of terminees to be sampled as follows:

(1) For adult terminees, divide 296 by the number of terminations which are expected to occur during the program year. (Example: assume an SDA expects 1500 terminations during the year: (296/1500 x 100 = 20%)).

(2) For welfare terminees, divide 321 by the number of welfare terminees expected. (Example: assuming the SDA above expects 60 percent of the 1500 terminations to have been receiving welfare at entry: 321/(.6 x 1500) x 100 = 36%).

(3) For dislocated workers terminees, divide 321 by the number of terminations which are expected to occur during the program year. (Example: assuming a State expects 2000 terminations during the year: (321/2000 x 100 = 16%)).

The above examples assume that independent "AD terminees", "WR terminees", and "DW terminees samples will be drawn. That may not be wholly necessary since "WR terminees" appearing in the "AD terminees" sample could also be included in the "WR terminees" sample.

Once the proportions are determined, a table of random numbers or other random selection techniques must be used to select the terminees who will be sampled. Terminees comprising the sample should be "flagged" at the time of termination and followup information should be obtained 13 weeks after termination.

Definition of Terms Necessary for Completion of Reports

Education Status

School Dropout—An individual who is not attending any school and has not received a high school diploma or a GED Certificate.

Student (high school or less)—An individual who is enrolled in an elementary or secondary school (including elementary, junior and senior high school or equivalent), or is between school terms and intends to return to school.

High School Graduate or Equivalent (no post-high school)—An individual who has received a high school diploma or GED Certificate, but who has not attended any post-secondary vocational, technical, or academic school.

Post-High School Attendee—An individual who is attending, or has attended, a post-secondary vocational, technical, or academic school.

Handicapped Individual—Refer to Section 4(10) of the Act. Any individual who has a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment.

Note.—This definition will be used for performance standards purposes, but not for program eligibility determination (Section 4(8)(E).

Labor Force Status

Employed—(a) An individual who, during the 7 consecutive days prior to application to a JTPA program, did any work at all: (i) as a paid employee; (ii) in his or her own business, profession or farm, or (iii) worked 15 hours or more as an unpaid worker in an enterprise operated by a member of the family; and (b) an individual who was not working, but has a job or business from which he or she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the employer for time off, and whether or not seeking another job. (This term includes members of the Armed Forces who have not been discharged or separated; participants in registered apprenticeship programs; and self-employed individuals.)

Unemployed—An individual who did not work during the 7 consecutive days prior to application to a JTPA program, who made specific efforts to find a job within the past 4 weeks prior to application, and who was available for work during the 7 consecutive days prior to application (except for temporary illness).

Not in Labor Force—A civilian 16 years of age or over who is not classified as employed or unemployed. (This term includes persons who never worked at a full-time job lasting 2 weeks or no longer and "discouraged workers," who have been and are longer actively seeking employment.)

Limited English Language Proficiency—Inability of an applicant, whose native language is not English, to communicate in English, resulting in a job handicap.

Offender—Refer to Section 4(17) of the Act. Any adult or juvenile who is or has been subject to any stage of the criminal justice process for whom services under this Act may be beneficial or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

Single Parent— A single, abandoned, separated, divorced, or widowed individual who has responsibility for one or more dependent children: (1) Under age 6, or (2) Ages 6 through 17.

UC Claimant—Any individual who has filed a claim and has been determined monetarily eligible for benefit payments under one or more State or Federal unemployment compensation programs, and who has not exhausted benefit rights or whose benefit year has not ended.

UC Exhaustee—Any individual who has exhausted his unemployment compensation benefits (not including Extended, Additional State, or Federal Supplemental Benefits) for which he has been determined monetarily eligible.

Attachment #1—Optional JTPA Performance Standards Worksheets (Completion Instructions)

The JTPA Performance Standards Worksheets (PSW) are provided to assist the Governor's staff in calculating performance standards for each of the performance measures.

A separate PSW is provided for each of the performance measures. The worksheets will assist the Governor in establishing Service Delivery Area (SDA) Performance Standards for each performance measure based on the Secretary's Performance Standards and any variations applied by the Governor within the Secretary's parameters.

To facilitate the Governor's calculation of performance standards, appropriate information has been preprinted on each PSW. This information includes:

(1) Local factors which influence performance potential (Column F);

(2) National Average Factor Values (Column H);

(3) Weights (Column J);

(4) National Average Performance Level (Block L); and

(5) Secretary's Parameters Limits (Block N).

The remainder of this attachment is divided into four parts:

Part A—Facsimiles of the Performance Standards Worksheets including appropriate preprinted information;

Part B—General Instructions for Completing the Performance Standards Worksheets;

Part C—Supplemental Instructions for Completing Selected Items on the Performance Standards Worksheets; and

Part D—Local Economic Data or Sources for Obtaining It.

Part A—Facsimiles of the JTPA Performance Standards Worksheets Including Appropriate Preprinted Information

BILLING CODE 4510-30-C

U.S. DEPARTMENT OF LABOR • Employment and Training Administration JTPA Performance Standards Worksheet	A. Service Delivery Area's Name	B. SDA Number
C. Performance Period PY ____ | D. Type of Standard ☐ Plan ☐ Recalculated | Date Calculated ____	E. Performance Measure A Entered Employment Rate (Adult)	

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTORS ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female		31.7		.03	
2. % 45-54 years old		4.5		-.36	
3. % 55 years old & over		2.2		.21	
4. % Black		23.9		-.37	
5. % Hispanic		9.4		.08	
6. % Other minority		4.9		.18	
7. % Dropout		30.2		-.08	
8. % Handicapped		10.1		-.20	
9. % UI claimant		7.8		.26	
10. % Welfare recipient		33.7		-.26	
11. Average wage for area		15,300		-.48	
12. Unemployment rate		9.0		-1.33	
				TOTAL ➤	

EXAMPLE

L. NATIONAL AVERAGE PERFORMANCE LEVEL		Q. SDA Performance Standard	
M. Secretary's Performance Standard			
N. Secretary's Parameters Limits	(+) (-) %		
O. Governor's Adjustment Factor within Parameters	( ) %		
P. Governor's Adjustment within Parameters	( ) %Pts.		

U.S. Department of Labor.Employment and Training Administration JTPA Performance Standards Worksheet	A. Service Delivery Area's Name	B. SDA Number
C. Performance Period PY ____ | D. Type of Standard ☐ Plan ☐ Recalculated | Date Calculated ____	E. Performance Measure • Welfare Entered Employment Rate (Adult)	

1. Secretary's Performance Standard for the Adult Entered Employment Rate ____
2. SDA (State) Welfare Entered Employment Rate Ratio ____
3. Welfare Entered Employment Rate ____
4. Secretary's Performance Standard ____
5. Secretary's Parameters Limits (+) ____ (-) ____ %
6. Governor's Adjustment Factor Within Parameters ( ) ____ %
7. Governor's Adjustment Within Parameters ( ) ____ %Pts.
8. SDA Performance Standard ____

EXAMPLE

BILLING CODE 4510-30-C

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Part B—General Instructions for Completing the JTPA Performance Standards Worksheets

The following provides general instructions for completing the JTPA Performance Standards Worksheets (PSW) found in Part A of this attachment. These instructions include the sources of data and computation methods for most of the items on the worksheets. However, the sources of the data and the computation methods for certain entries on the PSW warrant a more detailed explanation and may be found in Part C of this attachment. Supplemental instructions for completing Column G (SDA Factor Values) are provided in Part C of this attachment.

Instructions for Completing the JTPA Performance Standards Worksheets

A. Service Delivery Area's Name

Enter the Service Delivery Area's name.

B. SDA Number

Enter the JTPA number assigned by the Governor to the SDA.

C. Performance Period

Enter the program year for which the performance standard for each measure is being established.

D. Type of Standard/Date

Enter a check in the box next to the appropriate response (i.e., whether the standard is based on the SDA plan or is recalculated based on the end-of-year performance). For Date, enter for "Calculated" the date on which the calculations were made.

E. Performance Measure

The name of the appropriate performance measure for which the SDA Performance Standard is being established is preprinted.

F. Column F—Local Factors

The local factors determined by the Secretary to have a measurable influence on SDA expected performance levels for each of the performance measures have been preprinted.

G. Column G—SDA Factors Values

Enter the SDA's values for each local factor listed in "Column F" which reflect the characteristics of the planned participants who will terminate during the program year and the planned average number of weeks of participation for all terminees. These planning values should be obtained from the SDA's. The characteristics of the terminees must be expressed at a percent of the total planned number of participants who will terminate during the program year. The average weeks participated will reflect the sum of the number of weeks participated for all terminees divided by the total number of terminees. Data reflecting local economic conditions are provided in PART D of this attachment. These data should be used for the economic planning values in those cases where the SDA reflects the same geographical configuration as the previous program period. If the SDA's geographical configuration is changed, economic planning values should be obtained from the State Employment Security (SESAs) or the SDA. To the extent possible, the ETA will provide updated local economic conditions for each SDA at a later date. (See PART C of this attachment for detailed completion instructions.)

Note.—Actual SDA Factor Values based on actual experience will be substituted for the planned SDA Factor Values when the Secretary's Performance Standards are recalculated at the end of the performance period.

H. Column H—National Average Factor Values

The national average data for the local factors shown in "Column F" have been preprinted.

I. Column I—Difference

Enter the result of subtracting "Column H" from "Column G" for each local factor listed in "Column F".

J. Column J—Weights

The appropriate weight for each local factor listed in "Column F" has been preprinted.

K. Column K—Effect of Local Factors on Performance Expectations

Enter the net result of multiplying "Column I" by "Column J" for each local factor listed in "Column F".

L. Block L—National Average Performance Level

The national average performance level for each performance measure has been preprinted.

M. Block M—Secretary's Performance Standard

Enter the Secretary's Performance Standard by adding the plus factor, or subtracting the minus factor, found in the "Total" box for "Column K" to the National Average Performance Level ("Block L").

N. Block N—Secretary's Parameters Limits

The appropriate Secretary's Parameters Limits for each performance measure have been preprinted.

O. Block O—Governor's Adjustment Factor Within Parameters

The Governor may take into consideration exceptional or mitigating circumstances and thereby adjust the Secretary's Performance Standard ("Block M"). However, in *no* case may the Governor's adjustment go beyond the Secretary's Parameters Limits ("Block N") without approval by the Secretary. Any adjustment made by the Governor should be entered in "Block O".

Examples: The Secretary's Parameters Limits for the entered employment rate are +30% and −20%. The SDA's jurisdiction experienced a major plant opening after the period for which the economic data was generated, therefore the Governor adjusted the Secretary's Performance Standard upward by 5%. The +5% would be entered in "Block O".

The Secretary's Parameters Limits for the cost per entered employment are +40% and −10%. The SDA's jurisdiction experienced a major plant opening after the period for which the economic data was generated, therefore, the Governor adjusted the Secretary's Performance Standard downward by 5%. The −5% would be entered in "Block O".

P. Block P—Governor's Adjustment Within Parameters

The Governor's Adjustment Within Parameters will be the percentage points (dollars for the cost per measures and the average wage at placement measure) which will be added to or subtracted from the Secretary's Performance Standard ("Block M").

Examples:

If the Secretary's Performance Standard for the entered employment rate is 50% and the Governor's Adjustment Factor Within Parameters ("Block O") is +5%, then the Governor's Adjustment Within Parameters ("Block P") is +2.5% points.

If the Secretary's Performance Standard for the cost per entered employment is $4,500 and the Governor's Adjustment Factor Within Parameters ("Block O") is −5%, then the Governor's Adjustment Within Parameters ("Block P") is −$225.

Q. Block Q—SDA Performance Standard

The figure entered for the Governor's Adjustment Within Parameters ("Block P") should be added to or subtracted from the Secretary's Performance Standard ("Block M"). The result of this calculation is the SDA Performance Standard.

Examples:

If the Secretary's Performance Standard for the entered employment rate is 50% ("Block M") and the Governor's Adjustment Within Parameters is +2.5% points ("Block P"), then the SDA performance Standard is 52.5%.

If the Secretary's Performance Standard for the cost per entered employment is $4,500 and the Governor's Adjustment Within Parameters is $225, then SDA Performance Standard is $4,275.

Instructions for Completing the JTPA Performance Standards Worksheet (Welfare Entered Employment Rate)

A. Blocks A through E

Complete in accordance with the instructions provided for the JTPA Performance Standards Worksheets (PSW) for the other six measures.

B. Line 1—Secretary's Performance Standard for the Adult Entered Employment Rate

Transfer the figure in "Block M" (Secretary's Performance Standard) from the completed PSW for the adult entered employment rate measure.

C. Line 2—SDA (State) Welfare Entered Employment Rate Ratio

Enter the ratio of the welfare entered employment rate to the Total entered employment rate and shown on Attachment #1, PART D. Where the jurisdiction of the SDA is the same as that of the previous year, the SDA's ratio should be entered on "Line 2". Where the jurisdiction of the SDA is different, the State's ratio should be entered on "Line 2".

D. Line 3—Welfare Entered Employment Rate

Multiply the SDA (State) Welfare Entered Employment Rate Ratio ("Line 2") by the Secretary's Performance Standard for the Adult Entered Employment Rate ("Line 1") and post the results on "Line 3".

E. Block M—Secretary's Performance Standard

Transfer the figure shown on "Line 3" above to "Block M".

F. Blocks N through Q

Complete in accordance with the instructions for the JTPA Performance Standards Worksheets (PSW) for the other six measures.

Part C—Supplemental Instructions for Calculating Selected Items on the JTPA Performance Standards Worksheets

The following provides detailed instructions regarding data sources and computations for entries on the JTPA Performance Standards Worksheets for Column G (SDA Factor Values).

Column G (SDA Factor Values)—The following describes the sources of the planning data to be used in computing the planned value for each local factor found to influence performance expectations. The factors are terminee characteristics, average weeks participated, and economic data. Data concerning the terminee characteristics and the average weeks participated should be obtained from the SDA's. Local economic data are provided in PART D of this Attachment. If the SDA's geographical configuration is the same as the previous year, then the local economic data provided in PART D of this Attachment should be used. If the SDA's geographical configuration is different, the local economic data should be obtained from the State Employment Security Agency (SESA) or the SDA (if not already provided by the ETA). The specific entries for SDA Planned Values will be posted in "Column G" of the appropriate PSW.

1. *Terminee Characteristics.* Compute the percentages comprising the SDA Factor Values for terminee characteristics by utilizing the planned termination data for age, race, sex, public assistance status, educational status, etc. obtained from the SDA's. In computing the SDA Factor Values, the planned cumulative data through June 30, 1984 should be used. The basic formula for determining these entries is:

—the planned cumulative number of terminations through June 30, 1984 for each characteristic as a percent of the planned cumulative number of total terminations from the program.

Note.—Actual SDA Factor Values based on actual cumulative data through June 30, 1984 should be used in lieu of the planned SDA Factor Values when the Secretary's Performance Standards are recalculated at the end of the performance period. The basic formula for determining the actual SDA Factor Values entries is:

—the actual cumulative number of terminations through June 30, 1984 for each characteristic as a percent of the actual cumulative number of total terminations from the program.

Example: SDA #1 submits a plan which contains the following planned characteristic data through June 30, 1984:

Adult terminee characteristics	Planned adult terminations
Total	1,000
Males	551
Females	[illegible]
22 to 44 years	700
45 to 54 years	190
55 years and up	110
White	[illegible]
Black	412
Hispanic	391
American Indian or Alaskan Native	30
Asian or Pacific Islander	31
Post High School	[illegible]
Students (High School or Less)	[illegible]
Dropouts	[illegible]
High School Grad (or Equiv.)	[illegible]
Handicapped	[illegible]
UI Claimants	[illegible]
Welfare Recipients	[illegible]

The SDA Factor Values which would be posted in "Column G" of the appropriate PSW for SDA #1 would be as follows:

Local factors (percent)	Computation	SDA planned values
Female	[illegible] ÷ 1,000	[illegible]
45 to 54 years	190 ÷ 1,000	19.0
55 years and up	110 ÷ 1,000	11.0
Black	412 ÷ 1,000	41.2
Hispanic	391 ÷ 1,000	39.1
Other minority	(30 + 31) ÷ 1,000	6.1
Dropouts	[illegible] ÷ 1,000	[illegible]
Handicapped	[illegible] ÷ 1,000	[illegible]
UI claimants	[illegible] ÷ 1,000	[illegible]
Welfare recipients	[illegible] ÷ 1,000	[illegible]

Similar calculations as those shown above should be done in order to compute the SDA Factor Values for all of the terminee characteristics included as local factors in "Column F".

2. *Average Weeks Participated.* SDA's should provide to the Governor the planned average number of weeks of participation of all terminees. The planned Average Weeks Participated number should be entered in "Column G", SDA Factor Values.

3. *Local Economic Conditions.* The remaining local factors reflect SDA planning assumptions pertaining to economic conditions. The specific economic factors are:

—Unemployment Rate;

—Average Wage for the Area

As previously stated, PART D of this Attachment provides local economic data pertaining to CETA prime sponsors during FY 1982. To the extent that the SDA's geographical configuration is the same as the previous program period, the planning data on PART D of this Attachment should be used. If the SDA's geographical configuration is different, the SDA Factor Values for the economic factors should be obtained from the SESA or the SDA (if not already provided by the ETA). To the extent feasible, updated SDA economic planning data will be supplied by the ETA at a later date.

Performance Measures Calculation Formulas—Use the following formulas in order to compute the performance measures listed below:

Performance Measure and Applicable program(s)

(1) Entered Employment Rate—Adult and Youth

Planned Total Terminees Who Will Obtain Employment ÷ Planned Total Terminees

(2) Cost per Entered Employment—Adult

Planned Total Expenditures, Including Administrative Costs ÷ Planned Total Terminees Who Will Obtain Employment

(3) Average Wage at Placement—Adult
Average Wage of all Terminees who Entered Employment at Time of Termination

(4) Positive Termination Rate—Youth
Planned Total Terminees who will: (Obtain Employment) + (Enter non-Title II Training) + (Return to Full-Time School) + (Complete Program Objectives—14–15 Years Only) + (Complete Major Level of Education) ÷ Planned Total Terminees

(5) Cost Per Positive Termination—Youth
Planned Total Expenditures, including Administrative Costs ÷ Planned Total Terminees who will: (Obtain Employment) + (Enter non-Title II Training) + (Return to Full-Time School) + (Complete Program Objectives—14–15 Years Only) + (Complete Major Level of Education)

BARNEY FRANK, MASS., CHAIRMAN
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[illegible]

NINETY-EIGHTH CONGRESS
Congress of the United States
House of Representatives
MANPOWER AND HOUSING SUBCOMMITTEE
OF THE
COMMITTEE ON GOVERNMENT OPERATIONS
RAYBURN HOUSE OFFICE BUILDING, ROOM B-349-A
WASHINGTON, D.C. 20515

July 18, 1983

David Stockman
Director
Office of Management and Budget
Old Executive Office Building
Washington, D.C. 20500

Dear Mr. Stockman:

Based on the information we have received at our hearings on implementation of the Jobs Training Partnership Act, we urge you to approve promptly the proposals made by the Department of Labor on April 26 for performance standards and a national reporting system for the JTPA.

We heard testimony from all of the entities which will be involved in administering this important program: the National Alliance of Business; the Private Industry Councils; the AFL-CIO; the National Governors Association; the Conference of Mayors; the National Association of Counties; the National Employment Council; and the Department of Labor. These groups -- representing a broad range of opinions and experience -- unanimously agreed that the DOL's proposals for performance standards and a national reporting system are not only desirable, but are in fact essential if this program is to be sensibly run.

As Members of Congress who are charged with oversight responsibility for the JTPA, we believe strongly that we will be unable to give proper oversight to this program unless the standards proposed by DOL are put into effect. Without them, neither Congress nor the Executive Branch will have the information about program outcomes necessary to make informed judgements about the effectiveness of JTPA.

We think it would be unwise for OMB to block promulgation of these standards based on some general objection to Federal standard-setting. In this instance, those charged with administering this federally-funded program all want Federal standards of the sort proposed by the Labor Department. When business, labor, local voluntary groups, the states, the cities and the counties all call for reasonable, flexible minimum federal standards, it does not make sense for OMB to refuse them on the grounds of protecting local autonomy.

This seems to us particularly relevant because the testimony presented to us made it clear that there have been no significant discussions between OMB on the one hand, and the administering local and private groups on the other. If you would like to review the unanimous statement of these groups in support of the proposed reporting system and performance standards, the Subcommittee will gladly make it available.

Because the time for beginning this program is drawing hear, we urge you to give prompt approval to the thoughtful and appropriate regulations for the JTPA proposed by the Labor Department.

Barney Frank
BARNEY FRANK, CHAIRMAN

Jock McKernan
JOHN R. MCKERNAN, RANKING MINORITY CHAIR

Mel Levine
MEL LEVINE

Major R Owens
MAJOR R. OWENS

Joe P. Kolter
JOE P. KOLTER

Ben Erdreich
BEN ERDREICH

John M. Spratt Jr.
JOHN M. SPRATT, JR.

OIC GOVERNMENT RELATIONS
1725 "K" Street, N.W.
Suite 1111
Washington, D.C. 20006
(202) 659-4181

REV. LEON H. SULLIVAN
Founder & Chairman

DR. MAURICE A. DAWKINS
Director

ELTON JOLLY
National Executive Director

TESTIMONY

Of

Reverend Leon Sullivan

Chairman of Opportunities Industrialization
Centers of America, Inc.

Before the

Subcommittee on Manpower and Housing

Of the

House Committee on Government Operations

On

Performance Standards and Data Collection Systems

Under the

Job Training Partnership Act

August 15, 1983

Opportunities Industrialization Centers of America, Inc

My name is Leon Sullivan, I am Chairman of the Board of Opportunities Industrialization Center of America (OIC).

I wish to go on record as a strong advocate of creating and maintaining performance standards for deliverers of employment and training services.

Our non-profit network of employment and training services has nineteen years of experience in the job training and placement business.

We have trained more than 600,000 Americans of all ages and races and we have developed effective working relationships with local, state and federal governments as well as private sector corporations.

The National Administrations of five presidents have recognized our cost effective programs as among the most productive resources to the Department of Labor in carrying out the plans of the Congress under the Manpower Development and Training Act and The Comprehensive Employment and Training Act.

I refer briefly to our history because I think it is important to know that the conclusions we have reached and the recommendations that we make are based on hard data and solid facts gained from experience in recruiting, counseling, pre-vocational motivational training and skills training followed by evaluation and tracking of placement and past placement results.

As a result of this experience in more than 40 states and 150 rural and urban communities we are convinced that criteria for evaluation of performance are essential. Moreover we are convinced that expert deliverers of services should be included in the process of establishing the criteria.

Surely it is only practical to spend federal money to get the best product from the best training process. It is only common sense to hold training corporations and systems accountable for giving the best bounce from the buck and the best trained and placed trainees.

A reporting system for the Job Training Partnership Act performance standard, with the best possible data collection method deserves the support of every one concerned with the need for highly skilled employees in the workforce.

Mr. Chairman, I wish to commend your commitiee for your continued interest and I wish to go on record categorically and unequivocally supporting the proposed D.O.L. system of reporting requirements.

Accountability in J.T.P.A. program planning and administration can only be adequately maintained if performance standards are the primary mechanism and a useful information system is required.

I cannot conceive of a justification for the O.M.B. rejection of the D.O.L. proposal--but I strongly urge the members of your committee to recommend supportive legislation and utilize your good office to support the position of the

Department of Labor.

The argument that requirements of performance standards are too bureaucratic has been knocked down by the states and local governments themselves. The Service Delivery Areas in order to meet state reporting requirements will set up management information systems. The cooperation all along the line between public and private partners in the delivery of employment and training services is precisely what Congress intended when it passed the legislation.

We in O.I.C. are ready to cooperate in every way--We will do our part to implement the plans of the Department of Labor.

We fully support their original paoposal on performance standards.

Thank you.

**Indian and Native American
Employment and Training Coalition**

August 12, 1983

The Hon. Barney Frank
Chairman
Subcommittee on Manpower and Housing
Committee on Government Operations
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

The Indian and Native American Employment and Training Coalition would like to submit this letter and the attached listing of CETA/JTPA transition issues affecting Indian and Native American job training programs for the record of the Committee's hearings on these matters.

The Job Training Partnership Act, like CETA before it, authorizes special, nationally-administered programs to serve the needs of Indian and Native American workers, both within and outside reservation areas. JTPA provides that Indian programs, like non-Indian programs, comply with JTPA requirements starting on October 1st.

However, the Department of Labor has not moved expeditiously to put appropriate regulations and procedures in place in time for Indian program grantees to plan for an orderly transition to the new Act.

A listing of the problems currently confronting Indian grantees is attached. It shows:

* Because of DOL delays, key aspects of the implementation process are two-and-a-half months or more late. As of this date, barely 45 days before JTPA is to take effect, there are no final regulations for Indian programs, no Indian grantees have been designated for FY 1984, practically no planning guidance has been issued and no fund allocation formula has been published.

* DOL policy on the carryover of FY 1983 money (for a program delivery system which, unlike that for non-Indian programs, remains unchanged under the new law) may cost Indian programs millions of dollars in lost services.

* DOL support for Indian programs is declining substantially, in terms of the type and geographic proximity of Indian Division staff assigned to work

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with grantees. Indian grantees in the western states will now have to travel from 4,000 to 8,000 miles to see their assigned project officer, who, in many cases, will be totally unfamiliar with the special status and needs of Indian programs.

- DOL support for Indian programs is non-existent, in terms of legally mandated technical assistance to help grantees improve program performance. What little technical assistance is being provided is focused entirely on how to comply with the numerous DOL administrative requirements.

- DOL policy on the accounting for carryover funds and the lack of timely DOL guidance on JTPA procedures threatens to cost grantees significant amounts in costs that may be questioned and possibly disallowed in future audits.

We ask that the Committee continue its oversight functions with respect to DOL's management of the CETA/JTPA transition process, and that the Committee make a special investigation of the problems facing Indian and Native American grantees in the implementation of JTPA programs consistent with the requirements of the law.

Sincerely,

Lonnie Racehorse

Lonnie Racehorse
Facilitator

Attachment

Indian and Native American Employment and Training Coalition

August 8, 1983

CETA/JTPA TRANSITION ISSUES AND PROBLEMS

INDIAN AND NATIVE AMERICAN E&T PROGRAMS

Transition from CETA to JTPA Involves:

Development of new regulations

- DOL planned to issue new Indian regulations in final form by March 15
- DOL actually published new Indian regs in proposed form on July 20; Indian grantees are contesting major provisions in these proposed rules
- Final regulations will not be published until at least some time in mid to late September
- DOL has forced grantees to plan FY 84 JTPA programs on the basis of the proposed rules, including provisions that are contrary to explicit legislative intent

Issuance of transition instructions, including instructions on the use of carryover FY 83 funds during FY 84

- Instructions on use of carryover FY 83 funds not issued until July 27. Carryover limited to two months. Because of years of experience in receiving new FY funds from two to four months late, many grantees routinely carryover three months funds. Limitation on use of carryover to two months likely to cost Indian programs several million dollars and severely disrupt field operations.

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* DOL will require separate accounting for FY 83 carryover funds and FY 84 JTPA funds; this process involves major difficulties in the field and poses the danger of leading to tens of thousands of dollars in questioned audit costs, plus serious problems in the tracking of participant outcomes necessary for the implementation of the Indian performance standards system

Development of new forms and procedures

* New forms, including instructions involving major changes in cost classification that will affect all grantee accounting systems, will not be generally distributed until mid to late August. Date of final OMB clearance of forms is unknown.

Planning for Funding Period starting October 1 Involves:

Submission to DOL of "Notices of Intent" to apply for designation as grantee

* "Notices of Intent" due under Indian CETA regs on March 1; DOL would not accept until June 17

DOL issuance of designation letters

* Due under Indian CETA regs on June 1; currently expected sometime after August 15

DOL issuance of planning instructions for FY 84 grant applications

* Due under Indian CETA regs on June 1; DOL will not issue until at least August 15

* Instructions will involve use of new funding procedure and application narrative. Grantees to receive DOL training on these items the

third and fourth weeks of August; plans due to DOL in early September

DOL issuance of planning estimates of FY 84 grantee allocation levels

* Change in data base (from 1970 to 1980 Census) used in allocation formula involves potential major changes in individual grantee allocation levels of from -93% to +280% of current levels, assuming same amount of Indian set-aside

* DOL considering the use of a "hold harmless" factor in allocation formula; DOL expected to publish proposed formula for comment in late August, just days before FY 84 grant applications are due

Submission of FY 84 grant applications

* Requests for modifications of existing FY 83 grants, if necessary, due to DOL on September 1

* FY 84 submissions expected to be due approximately September 6, just one to two weeks after grantees receive training on how to prepare these submissions

Approval of FY 84 grant applications

* DOL says it will have plans approved by October 1

* DOL says it will release FY 84 money on or about October 1; grantees skeptical on grounds they have not received new FY money before late November in any of last seven Fiscal Years

Other Issues

Total fragmentation of authority over Indian program within ETA

- At least four separate ETA offices are routinely involved in all grant transactions affecting Indian grantees

- Indian grant files are not even kept in the ETA offices to which the documents involved must be submitted; there are major problems with grantees being penalized for documents submitted but lost within ETA

Lack of DOL staff with experience in Indian programs

- Law requires DOL to utilize "personnel of particular competence" in Indian programs in administration of Indian programs within Department; number of Indian staff within DOL likely to slip to three persons in near future (size of Indian Division is currently over 25 persons)

Closing of outstationed Indian Division offices

- DOL has closed the Indian Division office in Anchorage and will close the offices in Seattle, San Francisco and Denver at the beginning of September. Most Indian grantees are in the Western States; these will now have to travel from 4,000 to 8,000 miles round trip to meet with their DOL Fed Reps (project officers)

DOL refusal to provide TA support to program

- JTPA requires DOL to furnish TA to Indian program; DOL currently spending all Indian TA money on travel expenses involved in holding training sessions on DOL grant administration procedures. No funds available for TA to grantees to improve program operations.

APPENDIX 2.—DOL PROPOSAL FOR APPROACH TO PERFORMANCE STANDARDS

TECHNICAL
ASSISTANCE
GUIDE

PERFORMANCE MEASURES
FOR
DISLOCATED WORKER PROGRAMS

May 1983

Employment and Training Administration
U.S. DEPARTMENT OF LABOR
Washington, D.C.

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PREFACE

The purpose of this technical assistance guide is to identify and pull together some of the available operational data sources that may be of value to States in the process of planning and setting goals for their Dislocated Worker programs during the initial program period that runs from October 1, 1983 to June 30, 1984.

The material provided includes various tables that show relative outcome levels for different service approaches used in previous employment and training activities. In some cases, States may wish to utilize these same reporting systems within their jurisdictions to develop even more detailed statistics for planning and conducting their Dislocated Worker programs and related performance aspects.

PERFORMANCE MEASURES AND RELATED DATA SOURCES FOR JTPA TITLE III DISLOCATED WORKER PROGRAMS

PART I: INTRODUCTION

The key performance objective specified for programs operated under Title III of the Job Training Partnership Act (JTPA) will be the placement and retention of dislocated workers in unsubsidized jobs. Section 106(g) of the Act requires the Secretary of Labor to prescribe performance standards for State programs based on these criteria.

CURRENT STATUS OF STANDARDS FOR DISLOCATED WORKER PROGRAMS

As noted in the administrative issuance of April 12, 1983, however, the Secretary will be deferring such action for the initial nine month period (October 1, 1983 to June 30, 1984) due to the fact that there is an insufficient data base on which to prescribe standards at the present time.

Instead, each State will be setting performance goals for its dislocated worker program(s). These goals will not be subject to review by the Secretary during the initial period, although performance outcomes may be reported at the end of the period. At a minimum, therefore, the States are to establish their goals based on the following performance measures prescribed by the Secretary:

- Entered Employment Rate
  Number of individuals who entered employment as a percentage of the total number of participants who terminated services under the program.
- Cost per Entered Employment
  Total program expenditures from Federal funds divided by the total number of individuals who entered employment during the period.

The aim of this technical assistance guide is to furnish information assistance to States in developing their goals for dislocated worker programs in relation to the two measures cited above.

THIS DOCUMENT'S BASIC PURPOSE IS TO PROVIDE DATA REFERENCES FOR STATE USE IN SETTING GOALS FOR DISLOCATED WORKER PROGRAMS

Currently, only limited data references are available with respect to serving dislocated workers who become eligible under Title III of JTPA. Even so, there are data relevant to Title III eligibility groups that can be drawn from certain activities with enrollees having similar characteristics in other employment and training programs operated in the State during recent timeframes. This guide contains several data sets that attempt to take into account potential dislocated worker clients who will be participating through the various basic service strategies developed by the States to meet their respective circumstances.

PART II: DISLOCATED WORKER ELIGIBILITY CATEGORIES

The kinds of unemployed persons who are eligible to be served by dislocated worker programs under JTPA Title III are set forth in three categories as part of Section 302(a):

PARTICIPANT ELIGIBILITY CRITERIA

(1) those who are unlikely to return to their previous industry and/or occupation,

(2) those who have been displaced "as a result of any permanent closure of a plant or facility,"

(3) those who "are longterm unemployed and have limited opportunities for employment or reemployment in the same or a similar occupation in the area where such individuals reside, including any older individuals who may have substantial barriers by reason of age."

This same section of the Act provides that States will establish procedures for identifying "substantial groups of eligible individuals" including the use of private industry councils to help make such identifications.

DIFFERENCES AMONG CLIENT GROUPINGS MAY INFLUENCE SERVICE APPROACHES AND OUTCOMES

Unemployed persons in any of these three categories may frequently have been displaced from the same industry and/or occupation. They may also share common age, sex, education, and other characteristics. Nonetheless, there may also be some differences among the clientele groupings which can affect the type of service strategy selected and expected outcome levels.

Among persons falling in the first category, for example, there may be many current UI claimants or recent exhaustees who still hold expectations about returning to their former jobs. This might tend to be particularly common in cases where their previous employers have records of recalling some numbers of workers during past months and recent years. These persons may likewise share an attachment to higher wage levels for their former jobs which could inhibit them from accepting referrals to lower paying jobs or from enrolling for job training that would lead to lower pay employment.

Seniority will frequently be the factor influencing order of layoff and recall in both union and non-union settings. Thus, initial layoffs may mostly affect younger and less tenured workers. The deeper the cutbacks go, then the older and longer tenured employees will also be laid off. Occasions may arise where some of these workers are called back to work with their previous employers as a result of changes in the general economy or within particular areas.

The second category of dislocated workers may also include many current UI claimants or recent exhaustees. However, one main difference for those in this particular category is that their previous jobs presumably are "gone forever" due to the permanent closing of their previous plants and facilities.

Accordingly, they may be more willing to seek jobs with other employers and in different occupational fields. Among persons in this category are likely to be:

- Some who will be hesitant about moving to same or similar occupations in new geographic areas because they have strong attachments to living in their current communities,
- Some others, perhaps younger persons, who may want to stay with their present occupations and will be agreeable to relocating, particularly if their work involves higher wage levels, and
- Some others who might be anxious to start over in a new occupation if it offers promise of better job prospects for the future.

Finally, some others in this category may have to adjust their sights to taking jobs at lower pay than their previous employment assuming overall job opportunities are scarce in their areas.

SOME PARTICIPANTS WILL REQUIRE MORE EXPENSIVE AND INTENSIVE PROGRAM SERVICES

Persons in the third eligibility category, those who are longterm unemployed with limited opportunities in their communities, clearly face greater difficulties in becoming reemployed. Among these persons will be some who have experienced considerable frustration in past job-seeking and, consequently, may have developed negative attitudes toward continuing such efforts. Others in this category, however, may be willing to accept whatever job placement or training that is offered since they have dropped their previous attachments to former jobs, higher pay, etc. In any event, persons in this category may likely require more intensive and expensive services to overcome barriers they face and to prepare them for available jobs.

PART III: TYPES OF PROGRAM SERVICE STRATEGIES

A VARIETY OF PROGRAM ACTIONS ARE AUTHORIZED UNDER TITLE III

Once the State has identified its clientele for dislocated worker assistance, there are a variety of possible approaches for helping such clients to obtain unsubsidized employment. Section 303(a) of JTPA specifically authorizes a number of activities for which financial assistance may be used including:

(1) job search assistance including job clubs,

(2) job development,

(3) training in job skills for which demand exceeds supply,

(4) supportive services, including commuting assistance and financial and personal counseling,

(5) pre-layoff assistance,

(6) relocation assistance, and

(7) programs conducted in cooperation with employers or labor organizations to provide early intervention in the event of closures of plants or facilities.

Based on Section 303(b) of the Act, relocation assistance may be provided when the State determines "(1) that the individual cannot obtain employment within the individual's commuting area, and (2) that the individual has secured suitable long-duration employment or obtained a bona fide job offer in a relocation area in a State."

EACH STATE IS RESPONSIBLE FOR CHOOSING ITS OWN SERVICE STRATEGIES

It is entirely the State's option to choose the basic design for its dislocated worker programs from among the allowable activities cited in JTPA Section 303(a). Recent studies by the Congressional Budget Office[1] suggest that the most cost-effective approach might be to sequence services from least to most expensive -- starting with low cost job placement assistance for all or most participants and then progressing to the higher cost services such as job training or relocation for those who need them. These studies indicate that limited availability of jobs in various areas needs to be considered in shaping program mix, particularly in relation to assuring that job training programs reflect existing job opportunities.

1/ Congressional Budget Office studies, "Dislocated Workers: Issues and Options," July 1982; "Strategies for Assisting the Unemployed," December 1982.

The following subsections address the matter of available data sources for several of the main activities cited in the Act, namely -- job placement and job search assistance along with job training. States are free to use the other allowable activities as needed in formulating their dislocated worker programs. Each State may be able to identify other data sources that can provide some indication of possible outcome levels for these other activities (i.e. pre-layoff assistance, relocation assistance, cooperative early intervention programs, etc.).

PART IV: DATA SOURCES RELATING TO PROGRAM ACTIVITIES

SELECTION OF ACTIVITY OPTIONS CAN INFLUENCE PROGRAM COSTS AND OUTCOME RATES

This section presents several available data sources relating to potential outcome levels for three of the principal types of service approaches. It should be noted that the type of service approach selected impacts on how the State determines its goals against the two performance measures which the Secretary has prescribed for the dislocated worker program. For example, the job referral approach is likely to involve a higher volume of transactions with a lower rate of placement (i.e. Entered Employment Rate); however, since it also involves reduced time and effort per individual served, it is likely to produce a significantly lower Cost per Entered Employment. On the other hand, higher Entered Employment Rates are likely to result for those dislocated workers who participate in either intensive placement assistance or job training classes; likewise, however, these activities also cost more and will likely increase Cost per Entered Employment.

The following data sets are provided so that States can examine them in terms of anticipated effects of the basic service approaches on both Entered Employment Rates and Costs per Entered Employment. States can make whatever use is appropriate in setting goals for their dislocated worker programs. As previously indicated, these data are furnished strictly for informational purposes and States are free to develop other data or methods for establishing their goals.

A. Job Referral Assistance

JOB REFERRAL IS BASIC PART OF MOST EMPLOYMENT AND TRAINING PROGRAMS

One of the most direct and economical ways to help dislocated workers in obtaining employment will be to provide, whenever possible, immediate referrals to available jobs for which they are qualified. This type of approach has long been the biggest volume activity and the most frequently used tool among the array of Federal-State employment and training programs. Such efforts to recruit, screen, and refer applicants to employers who have reported job openings have been conducted through the network of State employment service local offices for the past fifty years. These State Job Service offices have been mandated by law to serve the general public and to register and assist a variety of special applicant categories such as unemployment insurance claimants, food stamp recipients, and others.

Job referral assistance has also been carried out as part of other employment and training programs such as the Work Incentive program (WIN), CETA, and the Trade Readjustment worker assistance activities. The job referral function can be organized in different manners, but its primary characteristic is that referrals are made to jobs lined up by staff rather than being sought out by the client as in the job search activity discussed next in subpart B.

JOB REFERRAL DATA IS CHARACTERIZED BY HIGH VOLUMES AND LOWER RATES OF PLACEMENTS

The most readily available and appropriate source for operational data on job referral assistance is each State's own Job Service system. Under its data system, each State compiles statistical information on clientele characteristics, services provided, and placement results for given time periods. Tables A1 - A2 are presented as an appendix to this section and contain State by State data that can be used in making projections for expected results from job referral assistance conducted as part of dislocated worker programs. For purposes of comparison, the table below summarizes national averages for placement rates covering the indicated groupings as extracted from Table A1 which shows the rates by individual States (expressed as percentages of total active job applications).

SUMMARY OF JOB SERVICE PLACEMENT RATES

October 1, 1981 - June 30, 1982

Groupings	Averages	Range Among States	Reference Table
ALL APPLICANTS	17%	7 - 36%	A1, Col 1
MALES	15	7 - 34	A1, Col 2
FEMALES	17	7 - 38	A1, Col 3
UI CLAIMANTS	11	3 - 53	A1, Col 4
ADULTS (Age 22+)	14	7 - 36	A1, Col 5
OLDER WORKERS (55+)	11	5 - 38	A1, Col 6
ECONOMICALLY DISADVANTAGED	17	5 - 49	A1, Col 7

The above rates tend to be on the low side since they are computed against a large volume of total applicants registering for work with State Job Service local offices and may not reflect the specialized client group of dislocated workers. Table A3 presents another way of looking at Job Service placement operations by showing numbers and percentages for total applicants, individuals referred to jobs, and those who are placed in jobs.

Shown below is a summary of the comparative data on proportions of Job Service referrals resulting in placements as contained in Table A3.

PERCENT OF ALL JOB REFERRALS RESULTING IN PLACEMENTS
October 1, 1981 - June 30, 1982

Groupings	National Averages	Range Among States	Reference Table
ALL APPLICANTS	41.7%	22.2-86.7%	A3, Pages 1-2
UI CLAIMANTS	33.1	21.2-68.3	A3, Pages 3-4
MALES	40.9	22.4-85.0	A3, Pages 5-6
FEMALES	42.9	23.0-88.2	A3, Pages 7-8
ADULTS (Age 22+)	38.2	22.8-69.4	A3, Pages 9-10
OLDER WORKERS (55+)	39.3	21.9-72.8	A3, Pages 11-12

In reviewing Table A3 data, the percentages of "Referrals Placed" need to be considered in tandem with the percentages of "Applicants Referred." This is because there tends to be an inverse relationship between these figures in the case of a number of States. In other words, States with much higher rates of "Applicants Referred" may have quite low rates of "Referrals Placed" and vice-versa.

STATES MAY WISH TO EXAMINE DATA ON UI CLAIMANTS AND OTHER GROUPS BEING REFERRED WITHIN THEIR JOB SERVICE SYSTEM

However, States choosing to use job referral assistance should find these several tables useful in looking at the relative picture of placement success among various clientele groupings. Of special relevance, perhaps, would be the experience data for UI claimants being assisted by Job Service activities since they very likely most closely resemble potential dislocated worker groups. In terms of national averages, UI claimants had a lower placement rate of 11 percent compared to a rate of 17 percent for applicants overall. The range of rates among the States shown in Table A1 varies for this same comparison and there were a number of States whose placement rate for UI claimants exceed that State's rate for total applicants (e.g. Alabama, Arizona, Maine, Nebraska, Washington, et al). The data also provides for comparisons between other groups shown such as adults, older workers, male, female, and the economically disadvantaged.

Comparative data are not collected nationally on costs per placement through Job Service operations. Dollar figures on total employment service expenditures from the various funding sources used by State agencies are not reported to the national level through ESARS or other reporting systems. Instead, the basic indicator of relative productivity reflected through the data system is average placements per staff year (see Table A2). Specific data on total expenditures and placements should be available within each State through the cost accounting activities of the State employment security agency. Thus, States may wish to develop their own cost per placement information from such records for use in planning their dislocated worker activities. It is worth noting, however, that job referral assistance is an inexpensive service to provide according to a recent Labor Department research study.[2] The researchers found that average costs per placement for local office employment assistance tended to fall in the $85-250 range.

B. Job Search Assistance

This particular approach is based on the idea that successful job hunting depends mostly on how well individuals are prepared for conducting their own job search efforts. Group job search activities primarily involve the teaching of job search skills, furnishing general labor market information, and providing staff support/supervision to individuals as they continue their job seeeking endeavors. These kind of activities were previously offered largely in an unstructured manner, but during recent years they have been developing as a separate and more intensive activity.

GROUP JOB SEARCH IS USEFUL TOOL IN STIMULATING PARTICIPANTS TO LOCATE JOB OPPORTUNITIES

Some type of group job search assistance has been becoming part of various employment and training programs on an increasing basis. ETA has previously expressed encouragement to State Job Service agencies about using this approach. A number of Job Service local offices have been providing limited job search assistance in the form of one day "Job Search Workshops" and also setting up "Job Finding Clubs." The WIN program has made "Group Job Seeking" an important part of its activities along with other intensive employability services such as counseling and job development. Some CETA prime sponsors have previously reported that job search assistance was being offered on a limited basis.

A variety of terms have emerged as part of the job search assistance area including "self-directed placement," "job factories," and "group job search" to cite a few. The principal method is to provide a group of unemployed individuals with training on how to conduct job search activities combined with a period of supervised job search. The groups generally range in size from five to twenty people and the group setting appears to provide the positive support and peer interchange needed to make the process work more effectively. It is significant to note from operational reports and research studies that group job search tends to work successfully with a wide range of applicants including those considered hard to place (e.g. ex-prisoners, alcoholics, handicapped, economically disadvantaged, et al).

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[2] U.S. Dept. of Labor, ASPER, "Placement Assistance in ES, WIN, and CETA", by Elise Bruml and John Cheston, March 1982.

GROUP JOB SEARCH HAS HIGHER RATES OF PLACEMENT THAN THROUGH STAFF REFERRALS

A recent Department of Labor study[3] cited evidence indicating that group job search has been producing higher placement rates than the traditional formal job referral activity. This seems to be the case in terms of various program settings as well as various applicant groupings. For purposes of this guide, the most readily available data has been drawn from ESARS information covering Job Service applicants participating in job search workshops and job finding clubs during the nine month period ending June 30, 1982. These data are presented on a State-by-State basis as part of Table B in the appendix. Shown below are the comparative placement results in terms of national averages for several applicant groupings (rates expressed as a percentage of all applicants entering the job search activity).

SELECTED PLACEMENT RATES FOR JOB SEARCH ACTIVITY
October 1, 1981 - June 30, 1982

Grouping	National Averages	Range Among States	Reference Table
ALL APPLICANTS	38%	16 - 74%	B, Col 3
MALES	38	17 - 100	B, Col 6
FEMALES	38	15 - 95	B, Col 9
UI CLAIMANTS	29	14 - 72	B, Col 12

The above data shows higher placement rates for all four groupings as compared to their rates for the job referral activity cited earlier. While the 29 percent rate for UI claimants is lower than for the other three groupings, it should be noted that it is nearly three times as high as the 10.6 percent rate through regular job referral.

Excluding any payments to participants, the cost of placement through group job search tends to range between $200-700 per placement according to the DOL study cited earlier. The Congressional Budget Office study referred to earlier indicated a cost of about $500 per placement for job clubs. States are advised to examine any previous activities of this type within their program agencies to determine probable cost per entered employment for this approach since such data are not available at the national level.

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[3] U.S. Dept. of Labor, ASPER, "Placement Assistance in the ES, WIN, and CETA," by Elise Bruml and John Cheston, March 1982.

Even though such cost figures will vary from State to State, it appears likely that group job search will cost more per placement than regular job referral services. Nonetheless, it also appears likely that group job search will be relatively inexpensive and cost effective considering it has higher success rates than job referral. Also, group job search has lower costs than do job training programs.

C. Job Training Programs

The basic circumstance for dislocated workers is that their previous jobs were found in declining industries and/or declining occupations. Hence, it seems evident that a sizeable proportion of them may benefit from participation in organized job retraining programs to prepare them for other occupational categories in which there are better employment and job retention prospects. The Congressional Budget Office estimates that probably as many as half of the dislocated worker clients can be expected to receive some kind of classroom training, on-the-job training, or related activity.

JOB RETRAINING ACTIVITIES ARE LIKELY TO BE A KEY PART IN CONDUCTING MOST DISLOCATED WORKER PROGRAMS

Although training is the most costly of the service approaches, it may likely constitute a major part of the program mix in virtually all States -- recognizing that the present work skills of dislocated workers are not in demand either where they live or in most other places. Therefore, with the assistance of Private Industry Councils, States will be determining what job opportunities are available for which dislocated workers could be trained. This will help to assure that training is geared to anticipated job openings and States can shape their training activities so as to best reflect the relative effectiveness of classroom training or on-the-job training in preparing participants for given occupational categories.

PROGRAM DATA ON JOB TRAINING ACTIVITIES UNDER CETA TITLES MAY SERVE AS USEFUL INDICATORS OF OUTCOME RATES AND COSTS

The most readily available source for actual operational data on job training programs is from the CETA programs conducted within each State. One major limitation needs to be noted, however, and that is due to the preponderance of economically disadvantaged and unskilled workers who participated in CETA. Nonetheless, recognizing this limitation, the CETA data can be useful in planning dislocated worker programs. Tables C1 and C2 in the appendix contain statewide compilations of prime sponsor data showing program outcomes and costs for CETA

Title IIB/C and CETA Title VII (PSIP) activities during the nine month period ending June 30, 1982.

The data in these tables can provide a basis for determining probable results for given configurations of program mix, clientele characteristics, and cost when used in conjunction with the special runs appended separately for each individual State. The special runs by State are in the same format as the national tables for the two CETA program categories:

CETA Title IIB/C

D1 - Program Status and Financial Summary
D2 - Summary of Participant Characteristics

CETA Title VII (PSIP)

D3 - Program Status and Financial Summary
D4 - Summary of Participant Characteristics

A summary of national average rates for selected groupings of participants in CETA IIB/C programs is presented below.

PLACEMENT RATES FOR CETA IIB/C PROGRAMS
October 1, 1981 - June 30, 1982

Groupings	National Averages	Range Among States	Reference Table
ALL TERMINEES	46%	21 - 70%	C1, Col 3
MALES	48	23 - 74	C1, Col 4
FEMALES	45	19 - 70	C1, Col 5
YOUTH	36	11 - 64	C1, Col 6
ADULTS	54	34 - 75	C1, Col 7
WHITES	49	21 - 74	C1, Col 8
BLACKS	41	0 - 100*	C1, Col 9
HISPANICS	48	0 - 100*	C1, Col 10
UI CLAIMANTS	61	42 - 86	C1, Col 11

* The data for this grouping by State is distorted by extremely small number of participants.

The listing below presents the same type of data for CETA Title VII (PSIP) programs.

PLACEMENT RATES FOR CETA VII (PSIP) ACTIVITIES
October 1, 1981 - June 30, 1982

Groupings	National Averages	Range Among States	Reference Table
ALL TERMINEES	55%	35 - 80%	C2, Col 3
MALES	57	33 - 81	C2, Col 4
FEMALES	52	33 - 91	C2, Col 5
YOUTH	52	30 - 87	C2, Col 6
ADULTS	56	39 - 83	C2, Col 7
WHITES	57	36 - 75	C2, Col 8
BLACKS	50	0 - 100*	C2, Col 9
HISPANICS	57	0 - 100*	C2, Col 10
UI CLAIMANTS	61	0 - 100*	C2, Col 11

* The data for this grouping by State is distorted by extremely small number of participants.

It should be noted that the 61 percent placement rate for participants who were UI claimants at time of entry is the highest in both programs among the selected clientele groupings listed. This same pattern also prevails for a number of States individually as shown in Tables C1 and C2 (appendix).

OUTCOME RATES MAY DIFFER ACCORDING TO TYPE OF TRAINING ACTIVITY USED

Job training programs are comprised of various types of training activities; hence, it is worthwhile to examine how well the different activity categories compare in terms of their relative placement success for participants. Tables C3 and C4 have been included as part of the appendix to show State-by-State entered employment rates by activity categories under both CETA IIB/C and VII programs during FY 1981. The national averages and ranges of rates among States by activity category in the two programs are summarized below.

ENTERED EMPLOYMENT RATES FOR CETA IIB/C ACTIVITIES
FY 1981

Activity Category	National Averages	Range Among States	Reference Table
OCCUPATIONAL CLASSROOM TRAINING	40%	19 - 69%	C3, Col 1
CLASSROOM TRAINING OTHER	30	3 - 91	C3, Col 2
ON-THE-JOB TRAINING	60	30 - 80	C3, Col 3
WORK EXPERIENCE	20	4 - 59	C3, Col 4
SERVICES ONLY	40	2 - 94	C3, Col 5

ENTERED EMPLOYMENT RATES FOR CETA VII ACTIVITIES
FY 1981

Activity Category	National Averages	Range Among States	Reference Table
OCCUPATIONAL CLASSROOM TRAINING	50%	12 - 91%	C4, Col 1
CLASSROOM TRAINING OTHER	40	16 - 88	C4, Col 2
ON-THE-JOB TRAINING	60	27 - 94	C4, Col 3
WORK EXPERIENCE	30	18 - 77	C4, Col 4
SERVICES ONLY	50	17 - 98	C4, Col 5

The same type of data by program activity categories were not collected and compiled later than FY 1981.

An explanatory note should be added regarding differences between placement rates and entered employment rates as presented in the various tables. The entered employment rates for both CETA titles will generally be the higher of the two since participants involved in inter-title transfers are excluded when computing the entered employment rate for either program.

CETA COST DATA IS NOT FULLY COMPARABLE DUE TO DIFFERENCES IN PROGRAM REQUIREMENTS FOR JTPA TITLE III

Tables C1 and C2 also show the cost per entered employment as compiled on a statewide basis for prime sponsors within each State during the first nine months of FY 1982. These costs include allowance payments for a large portion of participants in both IIB/C and VII programs. Also, it should be noted that these cost data for CETA are entirely Federal funds covering all costs and will not be wholly comparable to the new JTPA Title III situation which involves matching Federal and State funding. In addition, JTPA has set a 15 percent limitation on the costs of administration and a 15 percent limit on the costs of supportive services. The inflation factor also needs to be taken into account across the time periods involved.

The national average for IIB/C was $5,315 and VII (PSIP) was $4,369. IIB/C costs per entered employment ranged from $2,147 to $12,230 among the States while Title VII costs per entered employment ranged from $1,655 to $12,536 during the same period.

A composite picture of national average rates and costs for the several service approaches covered earlier in this guide is presented below. State by State figures will obviously differ according to their different situations; however, the general pattern is likely to be similar to that reflected below in that more intensive program activities result in higher placement (entered employment) rates as well as in higher costs per placement.

Type of Service	ENTERED EMPLOYMENT RATES		COSTS PER ENTERED EMPLOYMENT	
	National Averages*	Range Among States	National Averages*	Range Among States
JOB REFERRAL	17%	7 - 36%	NA	NA
JOB SEARCH CLUBS	38%	16 - 74%	$500a/	NA
JOB TRAINING ACTIVITIES	51% (IIBC) 61% (VII)	20 - 73% 41 - 85%	$5,315 $4,369	$2,147-12,230b/ $1,655-12,536b/
RELOCATION	NA	NA	$1,200c/	NA

NOTES:
- * National averages for all applicants/participants; however, such rates vary for each major characteristics grouping.
- a/ Estimate from Congressional Budget Office report.
- b/ These costs include allowance payments to participants.
- c/ Estimate from Congressional Budget Office report.

D. Other Sources of Related Program Data

There are other data sources that provide some indicators as to expected outcomes of program services provided to potential dislocated worker groups. Some of these are outlined in the remainder of this subsection.

1. Downriver Economic Readjustment Activity

This experimental program specifically designed to reemploy workers displaced due to plant shut downs has been underway in Wayne County, Michigan for the past two years. The Economic Readjustment activity (ERa) started in July, 1980 and has been operated by the Downriver Community Conference, a public non-profit community-based organization that has been the CETA program agent for the area. The project has been funded through a National Demonstration grant under CETA Title III (Discretionary) and from CETA IIB/C funding at the local prime sponsor level.

EXCELLENT RESULTS REPORTED FROM SPECIAL PROJECT TO AID WORKERS LAID OFF IN PLANT SHUTDOWNS

The overall goal of the project has been to enroll some 2,000 workers laid off from five plants in the area and "to return these workers, as expeditiously as possible, to quality jobs in the labor market." Private industry has cooperated actively in the program and the primary focus has been providing workers to meet the employers' needs. Participants have been channeled to program services that offer the most direct return to employment. For the year ending September 30, 1981, there were 663 participants of whom 91 percent were males, whites 74 percent, and blacks 25 percent. Seventy one percent of the enrollees were under age 45 and 29 percent were older. High school dropouts constituted 28 percent and the other 72 percent had at least a high school degree. During this period, 43 percent of the participants received job search services only, 42 percent classroom training, 6 percent on-the-job training, and 5 percent received relocation assistance for out-of-area jobs.

Based on local project operations data for the same period ending September 30, 1981, 432 participants had terminated and 368 of these were placed in jobs. These 368 placements represented 85 percent of the 432 terminations as of that date. Cost per enrollment was $2,393 and cost per placement averaged $4,312 according to local project figures. Also, by the time the implementation period ended on December 31, 1981, total placements had risen to 419 of the 663 participants amounting to a reemployment rate of 63 percent.

Copies of an outside evaluation report covering the implementation period for this Downriver ERa project can be obtained by contacting the Office of Research and Evaluation (TPR) in the ETA national office (601 D St. NW, Washington, D.C. 20213).

2. Continuous Longitudinal Manpower Survey (CLMS)

This ETA funded research project has accumulated data regarding previous enrollees in CETA programs during earlier years and identifies their employment status after terminating services. Some data currently available covers CETA enrolles during FY 1978 who participated in classroom training, on-the-job training, or STIP and who had terminated such CETA activities by the second follow-up survey conducted eighteen months after entry.

CLMS PROJECT OFFERS DATA ON REEMPLOYMENT OF PREVIOUS CETA TERMINEES WHO WERE PRIOR UI CLAIMANTS

Among the group of enrollees who were not yet receiving UI benefits at time of entry into CETA training, there were 3,918 total terminations by the time of the follow-up survey. Of these, there were 3,032 whose termination reasons was known and 886 whose termination reason was unknown. Among those whose termination reason was known (3,032), 1,689 or 55 percent had entered employment.

Another example from this same survey were enrollees who had been UI claimants for a least 26 continous weeks at time of entry into the CETA training. The follow-up survey showed that of 1,707 terminations for this group 1,282 reported reasons for their terminations and 425 did not. Of the 1,282, 659 or 51 percent had obtained employment following training.

A third example were participants who had exhausted benefits before entering CETA training. Of 567 participants in this grouping there were 439 reporting termination reason and 128 who did not. Of these 439, 270 or 62 percent had obtained jobs.

3. Trade Readjustment Act Worker Assistance

A number of States have had unemployed workers who were eligible for assistance under provisions of the Trade Act of 1974. Among the types of assistance made available to eligible workers adversely affected by imports were re-employment services, training, job search, and relocation allowances. In each State, these activities have been administered by the State Job Service agency which has compiled data regarding workers receiving such assistance over the past six or seven years.

TRADE ACT DATA MAY BE USEFUL IN SOME STATES WHERE AVAILABLE

Cumulative national figures for TRA during the period from April 1975 through September 1982 show a total of 482,782 submitting applications to the State Job Service offices. A total of 92,620 received job referrals (19.2%) and of those some 38,241 were placed in jobs (41.3%). There were 56,104 reported as entering training programs and 19,362 completed the training (34.5%) with 3,727 (19.3%) receiving job placements after training.

Individual States may wish to examine available data for TRA activities previously conducted within their States to determine whether such statistics might be useful in planning for dislocated worker programs.

4. Vocational Education Programs

Another possible source of useful data for States to explore is the Vocational Educational Data System (VEDS) maintained by each State in accordance with the Vocational Education Act (PL 94-482). This reporting system produces data covering numbers of persons trained and expenditures for various categories of training by training facilities within each State. This aspect is particularly relevant since the Job Training Partnership Act emphasizes the need for effective coordination with vocational educational programs within the States.

COORDINATION NEEDED WITH VOCATIONAL EDUCATION AND ECONOMIC DEVELOPMENT PROGRAMS

5. Special Economic Development Efforts

Some States have organized specially designed activities to assure that sufficient numbers of workers are trained and available to meet the employment needs of companies and industries expanding within their areas. "Quick Start" is one of the names given to these efforts which involve cooperative planning by private firms and business associations along with various State programs including economic development, vocational education, Job Service, and related agencies. The aim is to encourage and identify job expansion situations and then to assure that workers are recruited and trained to meet the needs of particular firms and industries. Where such programs are being planned or underway, States should consider including dislocated workers as a source of applicants.

PART V: SUMMARY

This guide has addressed the matter of possible data sources which States can utilize in planning goals for their dislocated worker programs. The data references were presented in relation to the two performance measures (i.e. Entered Employment Rate and Cost per Entered Employment) which the Secretary of Labor has prescribed for State use in setting their goals for the initial period starting October 1, 1983 and ending June 30, 1984.

Some discussion was also directed to the subject of clientele eligibility categories and the types of service approaches which States may choose to use in operating their dislocated worker programs. In most cases, States will probably decide on a number of strategies tailored to particular areas of the State where different situations exist. The several service approaches dealt with in this guide will need to be supplemented by the other activities authorized by JTPA Title III and as dictated by each State's individual situations.

JOB REFERRAL ASSISTANCE

Table A1

JOB SERVICE PLACEMENT RATES FOR SELECTED CLIENT GROUPS

October 1, 1981 - June 30, 1982

Placement rates for the job referral function are shown in the following table according to several client groupings that can be compared with potential dislocated worker groups. ESARS[1] data was used as a basis for calculating these rates. These particular rates exclude placements and obtained employment reported by States under the job search activity. For Table A1, the placement rate is defined as follows:

$$\frac{\text{Total Placements} \times 100}{\text{Total New Applications and Renewals}}$$

1/ Employment Security Automated Reporting System

Table A1

PLACEMENT RATES FOR STATE JOB SERVICE REFERRAL ACTIVITIES

October 1, 1981 - June 30, 1982

	TOTAL	MALE	FEMALE	CLAIMANTS	ADULTS	OLDER WORKERS	DISADVANTAGED ECONOMICALLY
ALABAMA	18%	18%	18%	31%	24%	19%	21%
ALASKA	24	23	25	15	30	23	32
ARIZONA	15	16	14	19	18	14	24
ARKANSAS	24	25	23	26	39	29	31
CALIFORNIA	19	20	18	13	19	17	15
COLORADO	17	18	15	11	20	16	20
CONNECTICUT	11	11	11	8	13	9	15
DELAWARE	10	10	10	11	15	11	5
DIST COLUMBIA	36	34	38	7	12	13	37
FLORIDA	23	24	21	17	24	17	22
GEORGIA	20	20	19	13	22	15	24
HAWAII	16	17	16	10	21	17	17
IDAHO	20	21	20	12	32	28	34
ILLINOIS	13	13	12	8	12	10	12
INDIANA	9	8	10	5	10	7	13
IOWA	19	19	20	9	24	24	25
KANSAS	18	19	17	10	20	14	18
KENTUCKY	20	19	22	10	21	17	24
LOUISIANA	24	24	23	14	30	20	32
MAINE	18	16	19	21	23	18	24
MARYLAND	12	11	12	7	13	11	12
MASSACHUSETTS	18	17	20	10	22	16	15
MICHIGAN	7	7	9	3	7	5	7
MINNESOTA	16	16	16	7	15	14	19
MISSISSIPPI	24	25	22	28	36	26	31
MISSOURI	13	13	14	9	18	11	14
MONTANA	28	28	29	14	35	33	35
NEBRASKA	22	22	20	53	28	23	18
NEVADA	19	21	16	12	23	20	27
NEW HAMPSHIRE	15	15	15	9	21	16	16
NEW JERSEY	13	12	13	5	15	10	13
NEW MEXICO	19	20	19	15	23	24	23
NEW YORK	26	24	29	18	34	30	18
NEW MEXICO	19	21	17	13	23	17	29
NORTH DAKOTA	32	30	35	23	47	36	49
OHIO	7	6	7	3	8	6	7
OKLAHOMA	24	24	23	13	28	24	29
OREGON	25	27	23	29	37	38	19
PENNSYLVANIA	25	22	29	19	31	35	17
PUERTO RICO	23	20	27	10	14	15	23
RHODE ISLAND	21	22	20	11	20	14	24
SOUTH CAROLINA	22	22	22	11	24	22	34
SOUTH DAKOTA	28	27	29	16	41	38	44
TENNESSEE	26	25	26	10	25	16	28
TEXAS	22	23	20	9	28	24	20
UTAH	26	25	27	24	44	39	30
VERMONT	17	16	18	10	27	19	38
VIRGINIA	12	13	11	8	15	13	13
WASHINGTON	29	31	26	33	36	45	21
WEST VIRGINIA	11	9	14	7	11	8	14
WISCONSIN	10	9	11	5	11	9	9
WYOMING	30	29	31	27	36	29	36

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COMPARATIVE PRODUCTIVITY OF STATE PLACEMENT ACTIVITIES

Table A2

AVERAGE NUMBER OF INDIVIDUALS PLACED PER STAFF YEAR

October 1, 1981 - September 30, 1982

The data listed by State on the following table are self-explanatory. This particular performance indicator has been used by the United States Employment Service for a period of years as a method for assessing the relative performance of job placement efforts by the various States. It should be noted that States having a low number may be experiencing substantial levels of unemployment and related general economic problems adversely affecting overall level of employment as well as available job openings.

Table A2

AVERAGE NUMBER OF PLACEMENT PER STAFF YEAR WORKED, FY 1982

Data Cumulative Through September 1982

ALABAMA	
ALASKA	223
ARIZONA	
ARKANSAS	201
CALIFORNIA	
COLORADO	192
CONNECTICUT	128
DELAWARE	
DIST COLUMBIA	
FLORIDA	213
GEORGIA	
HAWAII	186
IDAHO	180
ILLINOIS	168
INDIANA	156
IOWA	255
KANSAS	179
KENTUCKY	205
LOUISIANA	246
MAINE	
MARYLAND	
MASSACHUSETTS	
MICHIGAN	115
MINNESOTA	217
MISSISSIPPI	198
MISSOURI	169
MONTANA	254
NEBRASKA	
NEVADA	146
NEW HAMPSHIRE	168
NEW JERSEY	115
NEW MEXICO	179
NEW YORK	111
NEW MEXICO	204
NORTH DAKOTA	272
OHIO	94
OKLAHOMA	214
OREGON	178
PENNSYLVANIA	
PUERTO RICO	289
RHODE ISLAND	190
SOUTH CAROLINA	221
SOUTH DAKOTA	
TENNESSEE	229
TEXAS	220
UTAH	255
VERMONT	185
VIRGINIA	
WASHINGTON	
WEST VIRGINIA	129
WISCONSIN	135
WYOMING	230

Note: Figures have been omitted for those states whose data were either incomplete and/or inconsistent for purposes of compiling this table.

JOB REFERRAL ASSISTANCE

Table A3

STATE JOB SERVICE OPERATIONS DATA FOR JOB REFERRALS AND PLACEMENTS

October 1 1981 - June 30, 1982

This table presents additional detailed statistics covering the volume of applicants served through Job Service programs in the States. The data is arrayed so as to reflect how many applicants enter the placement services of local offices, how many actually get referred to jobs, the percentage of applicants referred, the total number placed in jobs, and the percentage that such placements represent to total applicants referred. These data are shown for all applicants in addition to certain subgroupings including UI Claimants, male, female, adults (age 22-54), and older workers (age 55 and up). Table A1 shows the percentages that placements were of total applicants for these groupings during this same period.

Table A3
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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

ALL APPLICANT GROUPS

	TOTAL ACTIVE APPLICANTS	INDIVIDUALS REFERRED	% APPLICANTS REFERRED	INDIVIDUALS PLACED	% REFERRALS PLACED
NATIONAL	16,546,084	4,379,851	29.6%	1,814,568	41.7%
CONNECTICUT	238,992	57,962	24.3	15,031	25.9
MAINE	82,366	24,099	29.3	8,820	36.6
MASSACHUSETTS	338,056	102,517	30.3	38,116	37.2
NEW HAMPSHIRE	55,354	19,784	35.7	6,615	33.4
RHODE ISLAND	65,453	19,856	30.3	8,639	43.5
VERMONT	61,142	20,555	33.6	6,606	32.1
NEW JERSEY	410,218	61,751	15.1	25,818	41.8
NEW YORK	804,513	204,597	25.4	109,700	53.6
PUERTO RICO	295,014	45,244	15.3	35,416	78.3
DELAWARE	35,722	4,582	12.8	2,070	45.2
DIST COLUMBIA	82,334	22,512	27.3	19,519	86.7
MARYLAND	205,154	31,469	15.3	13,635	43.3
PENNSYLVANIA	482,771	144,276	29.9	60,985	42.3
VIRGINIA	294,540	77,900	26.4	20,127	25.8
WEST VIRGINIA	160,850	29,945	18.6	9,079	30.3
ALABAMA	384,133	95,626	24.9	38,151	39.9
FLORIDA	613,274	227,332	37.1	93,876	41.3
GEORGIA	435,756	98,971	22.7	52,198	52.7
KENTUCKY	298,834	71,260	23.8	35,516	49.8
MISSISSIPPI	275,504	87,871	31.9	43,561	49.6
NORTH CAROLINA	533,071	145,989	27.4	65,654	45.0
SOUTH CAROLINA	252,815	84,429	33.4	36,883	43.7
TENNESSEE	304,047	88,752	29.2	52,431	59.1
ILLINOIS	640,837	113,242	17.7	46,860	41.4
INDIANA	485,422	95,488	19.7	29,216	30.6
MICHIGAN	826,994	81,456	9.8	30,169	37.0
MINNESOTA	277,251	75,579	27.3	29,437	38.9
OHIO	842,344	108,912	12.9	32,117	29.5

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

ALL APPLICANT GROUPS

	TOTAL ACTIVE APPLICANTS	INDIVIDUALS REFERRED	% APPLICANTS REFERRED	INDIVIDUALS PLACED	% REFERRALS PLACED
WISCONSIN	425,515	83,095	19.5%	25,792	31.0%
ARKANSAS	243,852	75,733	31.1	38,607	51.0
LOUISIANA	315,493	89,148	28.3	48,060	53.9
NEW MEXICO	144,379	40,378	28.0	14,885	36.9
OKLAHOMA	319,437	98,395	30.8	52,555	53.4
TEXAS	1,107,810	468,548	42.3	171,829	36.7
IOWA	269,079	83,645	31.1	33,379	39.9
KANSAS	181,141	55,498	30.6	21,619	39.0
MISSOURI	503,400	120,635	24.0	42,810	35.5
NEBRASKA	101,734	40,090	39.4	15,242	38.0
COLORADO	239,079	69,518	29.1	24,606	35.4
MONTANA	90,258	29,038	32.2	17,565	60.5
NORTH DAKOTA	71,176	34,880	49.0	16,464	47.2
SOUTH DAKOTA	68,651	34,215	49.8	13,725	40.1
UTAH	152,897	73,931	48.4	30,346	41.0
WYOMING	55,817	29,262	52.4	12,325	42.1
ARIZONA	229,073	73,685	32.2	20,754	28.2
CALIFORNIA	1,487,145	348,800	23.5	145,750	41.8
HAWAII	88,766	30,628	34.5	9,116	29.8
NEVADA	71,438	33,109	46.3	7,623	23.0
ALASKA	71,151	25,320	35.6	10,957	43.3
IDAHO	102,941	42,649	41.4	14,189	33.3
OREGON	186,567	70,714	37.9	21,884	30.9
WASHINGTON	236,524	86,981	36.8	38,241	44.0

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

UI JOB REFERRALS AND PLACEMENTS

	TOTAL UI APPLICANTS	UI APPLICANTS REFERRED	% APPLICANTS REFERRED	UI INDIVIDUALS PLACED	% REFERRALS PLACED
NATIONAL	5,753,440	1,000,958	19.8%	320,553	33.1%
CONNECTICUT	119,029	21,737	18.3	4,489	20.7
MAINE	33,023	6,053	18.3	1,862	30.8
MASSACHUSETTS	120,703	26,716	22.1	7,407	27.7
NEW HAMPSHIRE	33,659	8,752	26.0	2,469	28.2
RHODE ISLAND	30,259	6,201	20.5	2,033	32.8
VERMONT	24,793	5,627	22.7	1,523	27.1
NEW JERSEY	183,232	15,746	8.6	4,900	31.1
NEW YORK	280,693	49,943	17.8	21,419	42.9
PUERTO RICO	116,734	10,519	9.0	6,134	58.3
DELAWARE	10,536	903	8.6	340	37.7
DIST COLUMBIA	29,421	1,585	5.4	1,082	68.3
MARYLAND	119,499	13,768	11.5	4,737	34.4
PENNSYLVANIA	115,396	30,292	26.3	10,435	34.4
VIRGINIA	65,973	11,390	17.3	2,513	22.1
WEST VIRGINIA	65,691	8,154	12.4	1,758	21.6
ALABAMA	158,088	29,195	18.5	10,806	37.0
FLORIDA	205,835	55,090	26.8	19,562	35.5
GEORGIA	155,278	23,837	15.4	9,714	40.8
KENTUCKY	57,743	8,177	14.2	3,097	37.9
MISSISSIPPI	33,496	7,548	22.5	3,641	48.2
NORTH CAROLINA	202,073	38,270	18.9	14,846	38.8
SOUTH CAROLINA	97,352	21,297	21.9	5,882	27.6
TENNESSEE	89,274	13,897	15.6	6,011	43.3
ILLINOIS	248,513	37,703	15.2	11,730	31.1
INDIANA	183,263	23,919	13.1	5,544	23.2
MICHIGAN	393,916	20,321	5.2	6,388	31.4
MINNESOTA	74,710	16,282	21.8	4,033	24.8
OHIO	298,715	21,035	7.0	4,465	21.2

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

UI JOB REFERRALS AND PLACEMENTS

	TOTAL UI APPLICANTS	UI APPLICANTS REFERRED	% APPLICANTS REFERRED	UI INDIVIDUALS PLACED	% REFERRALS PLACED
WISCONSIN	159,708	21,706	13.6%	5,160	23.8%
ARKANSAS	79,286	18,631	23.5	8,397	45.1
LOUISIANA	126,297	21,352	16.9	8,866	41.5
NEW MEXICO	55,077	8,431	15.3	2,551	30.3
OKLAHOMA	64,531	11,419	17.7	5,115	44.8
TEXAS	298,845	73,798	24.7	16,564	22.4
IOWA	72,928	15,972	21.9	3,887	24.3
KANSAS	69,456	13,114	18.9	3,854	29.4
MISSOURI	218,371	38,399	17.6	10,789	28.1
NEBRASKA	33,344	9,017	27.0	2,906	32.2
COLORADO	78,930	12,469	15.8	3,446	27.6
MONTANA	27,705	4,514	16.3	2,275	50.4
NORTH DAKOTA	20,589	7,835	38.1	2,899	37.0
SOUTH DAKOTA	16,637	5,555	33.4	1,475	26.6
UTAH	44,182	16,014	36.2	5,839	36.5
WYOMING	6,337	2,482	39.2	924	37.2
ARIZONA	84,824	12,833	15.1	3,054	23.8
CALIFORNIA	433,985	89,055	20.7	30,125	33.5
HAWAII	33,949	7,957	23.4	1,827	23.0
NEVADA	31,558	9,754	30.9	1,984	20.3
ALASKA	31,926	7,536	23.6	2,747	36.5
IDAHO	43,861	11,913	27.2	2,999	25.2
OREGON	92,309	26,601	28.8	7,251	27.3
WASHINGTON	81,908	19,844	24.2	6,799	34.3

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

MALE JOB REFERRALS AND PLACEMENTS

	TOTAL MALE APPLICANTS	MALE APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL MALES PLACED	% REFERRALS PLACED
NATIONAL	9,000,833	2,475,195	30.3%	1,002,269	40.9%
CONNECTICUT	129,441	35,089	27.1	8,663	24.7
MAINE	45,342	14,112	31.1	4,694	33.3
MASSACHUSETTS	169,003	58,209	34.4	19,871	34.1
NEW HAMPSHIRE	33,192	11,974	36.1	4,015	33.5
RHODE ISLAND	32,133	11,021	34.3	4,745	43.1
VERMONT	33,963	11,573	34.1	3,701	32.0
NEW JERSEY	197,184	36,080	18.3	14,470	40.1
NEW YORK	395,472	107,034	27.1	55,370	51.7
PUERTO RICO	182,005	24,920	13.7	19,296	77.4
DELAWARE	19,082	2,600	13.6	1,092	42.0
DIST COLUMBIA	38,514	10,418	27.0	8,853	85.0
MARYLAND	109,024	19,154	17.6	7,715	40.3
PENNSYLVANIA	241,615	73,377	30.4	28,721	39.1
VIRGINIA	150,750	43,982	29.2	11,318	25.7
WEST VIRGINIA	105,132	17,026	16.2	4,943	29.0
ALABAMA	199,638	49,321	24.7	19,651	39.8
FLORIDA	340,245	135,722	39.9	57,132	42.1
GEORGIA	224,270	54,258	24.2	28,416	52.4
KENTUCKY	163,277	37,486	23.0	18,179	48.5
MISSISSIPPI	133,359	43,567	32.7	22,235	51.0
NORTH CAROLINA	275,612	80,251	29.1	36,660	45.7
SOUTH CAROLINA	122,892	44,757	36.4	19,721	44.1
TENNESSEE	149,469	45,811	30.6	26,547	57.9
ILLINOIS	328,247	63,745	19.4	26,055	40.9
INDIANA	272,438	51,361	18.9	15,273	29.7
MICHIGAN	470,151	46,096	9.8	16,161	35.1
MINNESOTA	157,500	45,112	28.6	16,694	37.0
OHIO	490,962	65,507	13.3	17,664	27.0

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

MALE JOB REFERRALS AND PLACEMENTS

	TOTAL MALE APPLICANTS	MALE APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL MALES PLACED	% REFERRALS PLACED
WISCONSIN	244,315	46,004	18.8	13,255	28.8
ARKANSAS	125,155	39,257	31.4	20,025	51.0
LOUISIANA	169,148	50,665	30.0	27,965	55.2
NEW MEXICO	85,531	23,225	27.2	8,335	35.9
OKLAHOMA	178,523	55,272	31.0	29,395	53.2
TEXAS	641,471	280,036	43.7	104,568	37.3
IOWA	147,598	45,413	30.8	16,899	37.2
KANSAS	100,057	32,025	32.0	12,413	38.8
MISSOURI	276,069	63,511	23.0	21,329	33.6
NEBRASKA	56,771	22,940	40.4	8,570	37.4
COLORADO	143,629	44,421	30.9	15,482	34.9
MONTANA	50,387	15,305	30.4	9,019	58.9
NORTH DAKOTA	40,921	19,476	47.6	8,937	45.9
SOUTH DAKOTA	37,470	18,236	48.7	6,881	37.7
UTAH	88,982	40,948	46.0	16,869	41.2
WYOMING	33,716	16,266	48.2	6,921	42.6
ARIZONA	134,535	42,630	31.7	12,066	28.3
CALIFORNIA	808,740	210,215	26.0	85,450	40.6
HAWAII	46,494	16,521	35.5	4,962	30.0
NEVADA	41,460	20,400	49.2	4,571	22.4
ALASKA	41,731	13,946	33.4	5,985	42.9
IDAHO	58,674	23,528	40.1	7,918	33.7
OREGON	101,890	41,965	41.2	12,818	30.5
WASHINGTON	137,254	53,447	38.9	23,781	44.5

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

FEMALE JOB REFERRALS AND PLACEMENTS

	TOTAL FEMALE APPLICANTS	FEMALE APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL FEMALES PLACED	% REFERRALS PLACED
NATIONAL	7,545,251	1,904,656	29.0%	812,299	42.9%
CONNECTICUT	109,551	22,873	20.9	6,368	27.8
MAINE	37,024	9,987	27.0	4,126	41.3
MASSACHUSETTS	169,053	44,308	26.2	18,245	41.2
NEW HAMPSHIRE	22,162	7,810	35.2	[illegible]	33.3
RHODE ISLAND	33,320	8,835	26.5	3,894	44.1
VERMONT	27,179	8,982	33.0	2,905	32.3
NEW JERSEY	213,034	25,671	12.1	11,348	44.2
NEW YORK	409,041	97,563	23.9	54,330	55.7
PUERTO RICO	113,0[illegible]9	20,324	18.0	16,120	79.3
DELAWARE	16,640	1,982	11.9	978	49.3
DIST COLUMBIA	43,820	12,094	27.6	10,666	88.2
MARYLAND	96,130	12,315	12.8	5,920	48.1
PENNSYLVANIA	241,156	70,899	29.4	32,264	45.5
VIRGINIA	143,790	33,918	23.6	8,809	26.0
WEST VIRGINIA	55,718	12,919	23.2	4,136	32.0
ALABAMA	184,495	46,305	25.1	18,500	40.0
FLORIDA	273,029	91,610	33.6	36,744	40.1
GEORGIA	211,486	44,713	21.1	23,782	53.2
KENTUCKY	135,557	33,774	24.9	17,337	51.3
MISSISSIPPI	142,145	44,304	31.2	21,326	48.1
NORTH CAROLINA	257,459	65,738	25.5	28,994	44.1
SOUTH CAROLINA	129,923	39,672	30.5	17,162	43.3
TENNESSEE	154,578	42,941	27.8	25,884	60.3
ILLINOIS	312,590	49,497	15.8	20,805	42.0
INDIANA	212,984	44,127	20.7	13,943	31.6
MICHIGAN	356,843	35,360	9.9	14,008	39.6
MINNESOTA	119,351	30,467	25.5	12,743	41.8
OHIO	351,382	43,405	12.4	14,453	33.3
WISCONSIN	181,200	37,091	20.5	12,537	33.8

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

FEMALE JOB REFERRALS AND PLACEMENTS

	TOTAL FEMALE APPLICANTS	FEMALE APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL FEMALES PLACED	% REFERRALS PLACED
ARKANSAS	118,697	36,476	30.7%	18,582	50.9%
LOUISIANA	146,345	38,483	26.3	20,095	52.2
NEW MEXICO	58,848	17,153	29.1	6,550	38.2
OKLAHOMA	140,914	43,123	30.6	23,160	53.7
TEXAS	466,339	188,512	40.4	67,261	35.7
IOWA	121,481	38,232	31.5	16,480	43.1
KANSAS	81,084	23,473	28.9	9,206	39.2
MISSOURI	227,331	57,124	25.1	21,481	37.6
NEBRASKA	44,963	17,150	38.1	6,672	38.9
COLORADO	95,450	25,097	26.3	9,124	36.4
MONTANA	39,871	13,733	34.4	8,546	62.2
NORTH DAKOTA	30,255	15,404	50.9	7,527	48.9
SOUTH DAKOTA	31,181	15,979	51.2	6,844	42.8
UTAH	63,915	32,983	51.6	13,477	40.9
WYOMING	22,101	13,016	58.9	5,404	41.5
ARIZONA	94,538	31,055	32.8	8,688	28.0
CALIFORNIA	678,405	138,585	20.4	60,300	43.5
HAWAII	42,272	14,107	33.4	4,154	29.4
NEVADA	29,978	12,709	42.4	3,052	24.0
ALASKA	29,420	11,374	38.7	4,972	43.7
IDAHO	44,267	19,121	43.2	6,271	32.8
OREGON	84,677	28,749	34.0	9,066	31.5
WASHINGTON	99,270	33,534	33.8	14,460	43.1

SOURCE: ESARS DATA
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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

ADULT JOB REFERRALS AND PLACEMENTS

	TOTAL ADULT APPLICANTS	ADULT APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL ADULTS PLACED	% REFERRALS PLACED
NATIONAL	11,740,911	2,904,997	27.8%	1,100,623	38.2%
CONNECTICUT	161,856	37,665	23.3	9,065	24.1
MAINE	57,700	15,932	27.6	5,656	35.5
MASSACHUSETTS	234,722	60,893	25.9	21,659	35.6
NEW HAMPSHIRE	39,936	14,192	35.5	4,671	32.9
RHODE ISLAND	46,662	12,747	27.3	5,020	39.4
VERMONT	43,275	13,834	32.0	4,303	31.1
NEW JERSEY	305,713	42,790	14.0	17,014	39.8
NEW YORK	578,858	135,692	23.4	66,017	48.7
PUERTO RICO	203,370	20,412	10.0	12,667	62.1
DELAWARE	25,049	3,391	13.5	1,440	42.5
DIST COLUMBIA	49,201	3,839	7.8	2,666	69.4
MARYLAND	152,838	21,472	14.0	8,917	41.5
PENNSYLVANIA	345,167	88,770	25.7	34,320	38.7
VIRGINIA	212,106	55,413	26.1	13,376	24.1
WEST VIRGINIA	118,902	18,483	15.5	4,547	24.6
ALABAMA	265,354	62,796	23.7	22,536	35.9
FLORIDA	437,145	156,535	35.8	62,138	39.7
GEORGIA	305,308	65,326	21.4	30,924	47.3
KENTUCKY	208,567	45,328	21.7	19,461	42.9
MISSISSIPPI	177,291	56,128	31.7	25,190	44.9
NORTH CAROLINA	389,022	103,642	26.6	43,245	41.7
SOUTH CAROLINA	180,779	57,604	31.9	22,155	38.5
TENNESSEE	215,716	55,697	25.8	29,628	53.2
ILLINOIS	465,627	71,431	15.3	25,435	35.6
INDIANA	343,552	66,159	19.3	18,105	27.4
MICHIGAN	623,919	52,088	8.3	17,350	33.3
MINNESOTA	172,601	45,972	26.6	14,693	32.0
OHIO	615,230	75,665	12.3	20,079	26.5
WISCONSIN	289,235	52,797	18.3	13,834	26.2

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

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STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

ADULT JOB REFERRALS AND PLACEMENTS

	TOTAL ADULT APPLICANTS	ADULT APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL ADULTS PLACED	% REFERRALS PLACED
ARKANSAS	160,893	49,463	30.7%	24,093	48.7%
LOUISIANA	218,304	58,563	26.8	29,421	50.2
NEW MEXICO	101,429	26,428	26.1	8,950	33.9
OKLAHOMA	214,250	63,257	29.5	32,909	52.0
TEXAS	778,633	323,483	41.5	114,756	35.5
IOWA	168,748	50,732	30.1	18,382	36.2
KANSAS	122,976	33,907	27.6	11,793	34.8
MISSOURI	343,839	78,365	22.8	25,894	33.0
NEBRASKA	67,707	26,720	39.5	9,587	35.9
COLORADO	178,342	50,672	28.4	17,099	33.7
MONTANA	62,732	18,854	30.1	10,901	57.8
NORTH DAKOTA	44,257	20,335	45.9	8,798	43.3
SOUTH DAKOTA	41,899	20,022	47.8	7,233	36.1
UTAH	102,004	47,161	46.2	18,847	40.0
WYOMING	38,737	19,875	51.3	8,137	40.9
ARIZONA	163,277	49,371	30.2	13,120	26.6
CALIFORNIA	1,113,895	247,840	22.2	96,225	38.8
HAWAII	63,788	21,179	33.2	5,794	27.4
NEVADA	52,815	24,730	46.8	5,522	22.3
ALASKA	52,155	17,448	33.5	7,295	41.3
IDAHO	70,685	28,028	39.7	8,422	30.0
OREGON	140,819	52,624	37.4	15,259	29.0
WASHINGTON	174,026	63,247	36.3	26,075	41.2

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

OLDER WORKER JOB REFERRALS AND PLACEMENTS

	TOTAL OLDER WORKER APPLICANTS	OLDER WORKER APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL OLDER WORKERS PLACED	% REFERRALS PLACED
NATIONAL	885,896	164,392	21.4%	62,888	39.3%
CONNECTICUT	17,364	2,845	16.4	670	23.6
MAINE	4,541	958	21.1	375	39.1
MASSACHUSETTS	21,000	4,533	21.6	1,624	35.8
NEW HAMPSHIRE	3,872	958	24.7	310	32.4
RHODE ISLAND	4,100	716	17.5	315	44.0
VERMONT	3,058	734	24.0	223	30.4
NEW JERSEY	34,507	3,600	10.4	1,374	38.2
NEW YORK	47,869	9,379	19.6	4,509	48.1
PUERTO RICO	14,247	1,278	9.0	931	72.8
DELAWARE	1,908	187	9.8	94	50.3
DIST COLUMBIA	2,516	181	7.2	124	68.5
MARYLAND	11,230	1,325	11.8	522	39.4
PENNSYLVANIA	22,759	5,957	26.2	2,361	39.6
VIRGINIA	13,876	2,624	18.9	699	26.6
WEST VIRGINIA	8,112	945	11.6	236	25.0
ALABAMA	20,313	3,129	15.4	1,315	42.0
FLORIDA	47,647	11,234	23.6	4,364	38.8
GEORGIA	20,448	2,789	13.6	1,243	44.6
KENTUCKY	14,036	1,976	14.1	805	40.7
MISSISSIPPI	10,780	2,240	20.8	1,026	45.8
NORTH CAROLINA	30,360	5,527	18.2	2,335	42.2
SOUTH CAROLINA	12,006	2,876	24.0	1,152	40.1
TENNESSEE	14,361	2,244	15.6	1,209	53.9
ILLINOIS	38,118	5,138	13.5	1,794	34.9
INDIANA	25,806	3,577	13.9	983	27.5
MICHIGAN	54,393	2,968	5.5	996	33.6
MINNESOTA	12,305	2,611	21.2	1,014	38.8
OHIO	42,520	3,843	9.0	971	25.3
WISCONSIN	21.889	3,096	14.1	845	27.3

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

STATE JOB SERVICE OPERATIONS DATA

October 1, 1981 - June 30, 1982

OLDER WORKER JOB REFERRALS AND PLACEMENTS

	TOTAL OLDER WORKER APPLICANTS	OLDER WORKER APPLICANTS REFERRED	% APPLICANTS REFERRED	TOTAL OLDER WORKERS PLACED	% REFERRALS PLACED
ARKANSAS	11,667	2,662	22.8%	1,260	47.3%
LOUISIANA	14,933	2,339	15.7	1,217	52.0
NEW MEXICO	7,599	1,646	21.7	632	38.4
OKLAHOMA	12,212	2,637	21.6	1,395	52.9
TEXAS	55,424	16,506	29.8	6,099	37.0
IOWA	11,203	3,069	27.4	1,246	40.6
KANSAS	9,178	1,627	17.7	630	38.7
MISSOURI	29,348	4,187	14.3	1,289	30.3
NEBRASKA	4,832	1,488	30.8	560	37.6
COLORADO	10,087	2,075	20.6	722	34.8
MONTANA	3,815	1,028	26.9	628	61.1
NORTH DAKOTA	2,441	869	35.6	333	38.3
SOUTH DAKOTA	3,348	1,240	37.0	480	38.7
UTAH	5,768	2,257	39.1	921	40.8
WYOMING	1,761	747	42.4	294	39.4
ARIZONA	13,580	3,271	24.1	344	25.9
CALIFORNIA	76,705	15,140	19.7	5,770	38.1
HAWAII	5,771	1,430	24.8	401	28.0
NEVADA	5,269	1,951	37.0	427	21.9
ALASKA	2,791	702	25.2	298	42.5
IDAHO	4,652	1,535	33.0	500	38.6
OREGON	8,154	3,022	37.1	888	29.4
WASHINGTON	9,417	3,496	37.1	1,635	46.8

SOURCE: ESARS DATA
REPORT MADE: 4 MAY 83

GROUP JOB SEARCH ACTIVITY

Table B

PLACEMENT RATES FOR JOB SEARCH WORKSHOPS AND JOB FINDING CLUBS AS OFFERED BY STATE JOB SERVICE LOCAL OFFICES

October 1, 1981 - June 30, 1982

The following table shows placement rates for Job Search Assistance activities conducted by State employment service agencies. ESARS data is used for Obtained Employment and for a small proportion of Job Service placements of persons participating in group job search activities. This table excludes data for a number of States where incomplete or inconsistent data was reported for the Job Search category. Table B uses the formula:

$$\frac{\text{Obtained Employment + Placements following JSW/JFC} \times 100}{\text{Total Applicants Entering JSW/JFC}}$$

Table 8

DATA RELATING TO GROUP JOB SEARCH ACTIVITY

USES-EMPLOYMENT & TRAINING ADMINISTRATION
NUMBER OF INDIVIDUALS ENTERING JC/JF, OBTAINING EMPLOYMENT OR BEING PLACED
AND OBTAINED EMPLOYMENT RATES--FY 1982 THROUGH JUNE (3 QTRS)

	NUMBER ENTERED	TOTAL OBT EMPL	OBT EMP RATE	NUMBER ENTERED	MALE OBT EMPL	OBT EMP RATE	NUMBER ENTERED	FEMALE OBT EMPL	OBT EMP RATE	NUMBER ENTERED	UI OBT EMPL	OBT EMP RATE
U.S. TOTAL	51,815	19,525	38	30,346	11,564	38	21,469	8,186	38	25,892	7,462	29
ALABAMA	857	317	37	389	166	43	468	170	36	330	108	33
DELAWARE	5	3	60	3	3	100	2	1	50	0	0	N/A
IOWA	3,029	901	30	2,088	567	27	941	34[illegible]	37	425	117	28
KENTUCKY	1,026	480	47	650	271	42	376	214	57	147	63	43
MAINE	1,684	621	37	1,069	380	36	615	254	41	400	101	25
MASSACHUSETTS	5,217	2,594	50	2,766	1,547	56	2,451	1,051	43	3,747	1,108	30
MICHIGAN	3,619	1,196	33	2,416	681	28	1,203	523	43	1,697	315	19
MISSISSIPPI	1,123	362	32	476	203	43	647	177	27	97	33	34
MONTANA	1,268	713	56	654	365	56	614	370	60	396	120	30
NEBRASKA	871	425	49	488	237	49	383	184	48	212	126	59
NEW HAMPSHIRE	818	249	30	369	112	30	449	145	32	746	191	26
NEW JERSEY	7,267	1,141	16	3,438	590	17	3,829	563	15	4,709	713	15
NORTH DAKOTA	778	204	26	490	110	22	288	99	34	437	77	18
PENNSYLVANIA	6,877	1,515	22	4,259	881	21	2,618	686	26	4,598	637	14
PUERTO RICO	154	68	44	116	44	38	38	36	95	37	17	46
RHODE ISLAND	1,247	504	40	591	234	48	656	238	36	946	274	29
SOUTH DAKOTA	504	375	74	221	185	84	283	190	67	65	47	72
UTAH	665	327	49	512	217	42	153	110	72	[illegible]56	102	40
WASHINGTON	2,632	1,141	43	1,553	718	46	1,079	411	49	1,227	434	35
WEST VIRGINIA	182	60	33	101	37	37	81	31	38	70	20	29
WISCONSIN	7,019	3,075	44	4,567	1,947	43	2,452	1,136	46	3,209	927	29

PREPARED IN USES OFFICE OF PLANNING & REVIEW
FEBRUARY 24, 1983

NOTE: This table excludes data for a number of States where incomplete or inconsistent data was reported for applicants participating in Job Search Workshops or Job Finding Clubs conducted by State Job Services offices.

JOB TRAINING ACTIVITIES

Tables C1 and C2

SELECTED OUTCOME RATES FROM CETA IIB/C AND PSIP OPERATIONS

October 1, 1981 - June 30, 1982

The next two tables provides performance outcome data for programs conducted under CETA Title IIB/C and for CETA Title VII (PSIP).

Data is shown on a State by State basis for Entered Employment Rates and for Cost Per Entered Employment.

In addition, these tables show comparative placement rates for various clientele subgroups during the period. Formula definitions for the three measures are as follows:

Entered Employment Rate

$$\frac{\text{Placement} \times 100}{\text{Total Terminations} - \text{Intertitle Transfers}}$$

Cost per Entered Employment

$$\frac{\text{Accrued Expenditures}}{\text{Total Entered Employment}}$$

Placements as % of Terminations

$$\frac{\text{Placements} \times 100}{\text{Total Terminations}}$$

SELECTED EMPLOYMENT OUTCOME RATES - OCTOBER, 1981 TO JUNE, 1982 TITLE IIB

Table C1, Page 1

	ENTERED EMPLOYMENT		PLACEMENT RATES BY DEMOGRAPHIC CHARACTERISTIC								
				SEX		AGE		RACE/ETHNIC			
STATE	RATE	UNIT COST	TOTAL	MALE	FEMALE	YOUTH	ADULT	WHITE	BLACK	HISP	UI CLAIMANT
ALABAMA	54	4,442	49	49	49	38	56	51	47	56	53
ALASKA	52	9,160	48	49	47	38	54	54	45	56	58
ARIZONA	56	4,396	52	53	51	36	64	58	57	58	72
ARKANSAS	66	3,850	66	70	61	63	67	69	58	88	79
CALIFORNIA	51	4,578	48	50	47	39	54	51	44	46	58
COLORADO	58	2,822	55	55	54	48	57	56	54	52	69
CONNECTICUT	55	5,200	52	57	47	45	56	55	51	50	64
DELAWARE	48	4,348	43	45	42	38	48	47	37	66	76
DIST OF COLUMBIA	53	11,216	36	45	32	39	34	33	34	54	49
FLORIDA	55	5,686	51	56	48	43	56	57	46	54	67
GEORGIA	39	8,944	35	35	35	24	49	40	31	30	53
HAWAII	71	3,808	70	74	68	63	75	71	53	67	72
IDAHO	57	4,272	54	54	54	43	60	55	48	41	66
ILLINOIS	41	7,553	39	39	39	30	45	39	34	52	51
INDIANA	46	7,544	42	44	41	35	46	47	30	39	61
IOWA	48	5,979	45	47	43	43	47	48	25	31	54
KANSAS	54	4,906	53	53	54	49	56	63	36	47	70
KENTUCKY	40	7,608	34	35	32	19	45	37	23	38	53
LOUISIANA	43	5,729	41	42	41	32	51	58	34	20	60
MAINE	73	3,670	67	72	72	60	72	68	64	38	86
MARYLAND	72	2,485	67	72	62	54	74	64	69	62	80
MASSACHUSETTS	64	4,307	63	66	59	54	67	67	57	51	75
MICHIGAN	38	7,597	35	35	35	27	40	38	28	41	54
MINNESOTA	52	3,550	46	48	42	30	55	48	35	43	70
MISSISSIPPI	53	5,592	44	46	42	32	55	55	39	80	65
MISSOURI	54	4,491	45	45	45	29	61	47	39	59	68
MONTANA	56	2,285	56	58	54	57	56	59	46	54	64
NEBRASKA	50	3,341	46	50	41	41	48	49	44	40	55
NEVADA	67	3,749	63	66	61	59	66	62	65	63	70
NEW HAMPSHIRE	69	4,867	66	60	70	64	66	65	50	89	69
NEW JERSEY	50	6,583	47	49	46	43	50	56	41	41	55
NEW MEXICO	46	12,230	43	45	42	36	48	52	31	41	55
NEW YORK	52	5,444	49	49	49	36	58	50	45	45	63
NORTH CAROLINA	41	6,111	32	35	29	19	50	41	25	41	53
NORTH DAKOTA	21	9,185	21	23	19	11	35	21	0	0	47
OHIO	35	7,334	31	31	31	21	37	31	29	39	42
OKLAHOMA	65	3,663	58	59	58	50	64	64	48	49	68
OREGON	57	3,672	51	51	50	38	57	53	32	46	66
PENNSYLVANIA	43	6,759	44	44	44	35	50	44	45	34	60
RHODE ISLAND	51	6,997	41	44	38	31	49	42	38	33	61

SELECTED EMPLOYMENT OUTCOME RATES - OCTOBER, 1981 TO JUNE, 1982

TITLE IIBC

Table Cl, Page 2

	ENTERED EMPLOYMENT		PLACEMENT RATES BY DEMOGRAPHIC CHARACTERISTIC								
				SEX		AGE		RACE/ETHNIC			
STATE	RATE	UNIT COST	TOTAL	MALE	FEMALE	YOUTH	ADULT	WHITE	BLACK	HISP	UI CLAIMANT
SOUTH CAROLINA	69	4,389	67	74	62	64	70	74	64	40	80
SOUTH DAKOTA	65	2,154	64	65	63	63	64	66	86	100	74
TENNESSEE	48	6,662	45	44	45	36	52	50	36	55	66
TEXAS	58	4,283	53	56	51	44	61	56	49	56	64
UTAH	55	4,312	48	52	43	34	57	48	47	46	68
VERMONT	60	2,147	54	56	51	50	56	54	100	0	67
VIRGINIA	46	4,697	42	44	39	35	47	47	33	85	62
WASHINGTON	62	4,041	54	56	52	43	64	56	44	57	74
WEST VIRGINIA	51	9,200	43	38	50	43	44	47	29	0	51
WISCONSIN	54	3,939	48	47	48	37	56	54	16	39	69
WYOMING	62	5,650	60	69	54	63	59	62	70	58	67
AMERICA SOMOA	20	29,412	20	33	10	19	21	0	0	0	0
GUAM	31	11,403	31	30	31	31	30	0	0	100	0
	40	52,029	40	33	50	33	50	0	0	0	0
PUERTO RICO	48	8,235	48	51	44	36	58	0	0	48	57
	37	28,207	37	26	71	39	29	0	0	0	0
VIRGIN ISLANDS	21	11,615	21	19	23	19	24	0	22	13	0
U.S. TOTAL	51	5,315	46	48	45	36	54	49	41	48	61

Table Cl, Page 2

SELECTED EMPLOYMENT OUTCOME RATES - OCTOBER, 1981 TO JUNE, 1982 TITLE VII

Table C2, Page 1

STATE	ENTERED EMPLOYMENT		PLACEMENT RATES BY DEMOGRAPHIC CHARACTERISTIC								
				SEX		AGE		RACE/ETHNIC			
	RATE	UNIT COST	TOTAL	MALE	FEMALE	YOUTH	ADULT	WHITE	BLACK	HISP	UI CLAIMANT
ALABAMA	69	3,735	67	75	59	58	71	71	64	100	67
ALASKA	60	7,370	57	64	50	71	53	46	67	67	0
ARIZONA	76	4,219	67	63	70	67	67	71	58	64	76
ARKANSAS	76	6,465	76	78	72	74	76	75	77	50	70
CALIFORNIA	59	5,121	52	54	48	53	51	51	46	54	66
COLORADO	65	2,674	60	62	58	63	59	61	58	58	60
CONNECTICUT	69	5,4[illegible]8	63	66	58	62	63	64	58	56	68
DELAWARE	55	5,235	54	54	53	49	55	55	54	38	67
DIST OF COLUMBIA	81	3,695	80	81	78	78	83	67	87	44	79
FLORIDA	72	2,919	61	62	60	60	62	63	59	71	62
GEORGIA	68	2,909	65	65	64	74	58	63	65	73	63
HAWAII	69	1,890	57	49	68	61	54	57	0	50	82
IDAHO	65	3,858	62	61	63	60	63	64	33	48	55
ILLINOIS	56	6,419	52	54	51	48	54	56	49	50	60
INDIANA	47	4,243	40	43	36	41	40	46	30	31	45
IOWA	41	11,396	35	36	34	30	39	36	36	33	65
KANSAS	52	7,249	51	56	41	53	50	55	48	50	57
KENTUCKY	57	9,113	49	52	46	51	47	52	42	0	52
LOUISIANA	63	6,189	50	48	53	51	50	54	48	33	42
MAINE	84	4,944	46	52	33	38	48	46	0	0	42
MARYLAND	69	3,132	64	66	62	61	66	55	67	92	72
MASSACHUSETTS	68	4,500	60	61	60	61	60	64	45	50	66
MICHIGAN	53	6,337	48	50	44	39	51	53	38	48	59
MINNESOTA	75	1,655	65	66	63	69	63	65	61	75	64
MISSISSIPPI	53	1,935	48	56	40	44	50	62	40	0	70
MISSOURI	70	5,029	63	63	64	66	62	68	50	36	63
MONTANA	41	6,255	0	0	0	0	0	0	0	0	0
NEBRASKA	76	1,786	72	72	73	87	55	68	77	70	57
NEVADA	68	5,338	61	61	60	56	64	69	50	38	43
NEW HAMPSHIRE	85	5,372	65	69	61	63	66	64	0	100	33
NEW JERSEY	55	4,765	45	50	40	45	46	44	43	59	49
NEW MEXICO	68	4,692	66	66	67	62	69	70	100	66	60
NEW YORK	59	6,923	56	52	62	47	61	64	53	43	68
NORTH CAROLINA	52	3,805	47	47	47	31	64	48	46	0	64
NORTH DAKOTA	53	7,377	47	41	56	39	58	45	0	0	50
OHIO	49	6,946	40	40	40	40	40	44	35	15	41
OKLAHOMA	75	4,556	62	65	60	59	63	61	62	80	80
OREGON	66	3,377	60	61	60	50	64	63	38	55	72
PENNSYLVANIA	65	4,299	53	56	48	52	53	54	52	32	60
RHODE ISLAND	75	4,532	68	70	59	68	68	68	71	80	76

Table C2, Page 1

SELECTED EMPLOYMENT OUTCOME RATES - OCTOBER, 1981 TO JUNE, 1982 TITLE VII

Table C2, Page 2

PLACEMENT RATES BY DEMOGRAPHIC CHARACTERISTIC

STATE	ENTERED EMPLOYMENT RATE	ENTERED EMPLOYMENT UNIT COST	TOTAL	SEX MALE	SEX FEMALE	AGE YOUTH	AGE ADULT	RACE/ETHNIC WHITE	RACE/ETHNIC BLACK	RACE/ETHNIC HISP	UI CLAIMANT
SOUTH CAROLINA	66	5,149	65	72	57	63	66	72	58	100	79
SOUTH DAKOTA	64	2,940	50	63	39	38	59	51	100	0	100
TENNESSEE	45	2,114	40	45	36	38	42	45	33	38	52
TEXAS	70	2,606	67	71	62	65	67	71	63	67	67
UTAH	71	2,676	68	69	66	69	68	69	78	68	86
VERMONT*	76	1,879	74	68	91	70	78	74	100	0	78
VIRGINIA	57	3,456	47	54	39	41	51	49	46	25	56
WASHINGTON	63	3,437	61	66	56	48	67	59	64	66	74
WEST VIRGINIA	81	7,687	72	75	67	64	75	72	67	100	88
WISCONSIN	64	3,568	59	61	56	55	61	67	32	55	72
WYOMING	57	12,536	53	33	58	50	57	50	0	50	100
GUAM	54	3,234	54	47	56	56	52	0	0	0	0
PUERTO RICO	81	4,005	81	81	82	82	80	0	0	81	85
VIRGIN ISLANDS	47	6,267	45	50	44	39	52	0	44	60	0
ALASKA	0	0	0	0	0	0	0	0	0	0	0
U.S. TOTAL	61	4,369	55	57	52	52	56	57	58	57	61

Table C2, Page 2

JOB TRAINING ACTIVITIES

Tables C3 and C4

ENTERED EMPLOYMENT RATES BY TRAINING ACTIVITY CATEGORY

FY 1981

The following two tables show the comparative success of the several training activities in terms of those participants entering employment upon completion of the training and/or service received.

Table C3 presents this data for the CETA Title IIB/C programs and Table C4 shows the data by State for CETA Title VII (PSIP) programs during FY 1981.

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE II BC ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Table 3, Page 1

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
ALABAMA	40	28	64	14	86	32
ALASKA	36	17	58	26	17	31
AMERICAN SAMOA	13	0	51	39	0	33
ARIZONA	63	44	59	10	75	34
ARKANSAS	43	25	76	28	84	50
CALIFORNIA	54	45	68	29	45	47
CANAL ZONE						
COLORADO	52	40	71	31	56	50
CONNECTICUT	49	29	66	23	50	38
DELAWARE	42	34	62	9	48	30
DISTRICT OF COLUMBIA	43	3	0	4	2	20
FLORIDA	48	31	53	28	50	43
GEORGIA	50	34	60	13	43	34
GUAM	38	0	42	13	0	24
HAWAII	52	65	74	29	88	48
IDAHO	58	45	72	53	53	57
ILLINOIS	41	22	57	16	47	36
INDIANA	44	25	65	31	41	36
IOWA	52	31	64	4	47	41
KANSAS	66	21	78	59	87	63
KENTUCKY	46	26	73	19	18	33
LOUISIANA	52	56	67	26	94	45
MAINE	60	52	77	45	67	60
MARYLAND	47	35	65	29	55	43

Table C3, Page 1

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE II BC ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Table C3, Page 2

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
MASSACHUSETTS	59	42	70	25	78	53
MICHIGAN	36	20	68	18	42	31
MINNESOTA	53	26	77	18	44	40
MISSISSIPPI	57	12	67	17	24	37
MISSOURI	59	56	69	32	62	49
MONTANA	19	12	55	24	25	32
NEBRASKA	32	22	56	11	48	35
NEVADA	53	91	60	40	50	60
NEW HAMPSHIRE	62	48	78	57	21	60
NEW JERSEY	52	27	64	25	79	45
NEW MEXICO	26	11	60	24	67	37
NEW YORK	57	25	76	28	50	43
NORTH CAROLINA	23	35	70	22	47	34
NORTH DAKOTA						
OHIO	30	14	59	18	43	29
OKLAHOMA	63	47	59	40	71	55
OREGON	41	32	66	28	36	38
PENNSYLVANIA	42	27	68	23	45	38
PUERTO RICO	38	0	76	26	0	40
RHODE ISLAND	57	31	69	20	29	39
SOUTH CAROLINA	69	48	76	26	53	55
SOUTH DAKOTA	50	34	69	44	58	54
TENNESSEE	30	36	64	12	33	28
TEXAS	53	52	68	31	56	49

Table C3, Page 2

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE II BC ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Table C3, Page 3

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
UTAH						
VERMONT	60	55	80	47	53	56
VIRGINIA	40	21	52	22	47	33
VIRGIN ISLANDS	0	0	0	87	0	93
WASHINGTON	56	37	72	35	56	51
WEST VIRGINIA	33	11	30	13	39	22
WISCONSIN	55	34	80	28	53	43
WYOMING						
PROGRAM TOTAL	40	30	60	20	40	40

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U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE VII (PSIP) ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Table C4, Page 1

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
ALABAMA	48	27	65	66	93	50
ALASKA	12	0	66	0	0	48
AMERICAN SAMOA	0	0	48	0	0	35
ARIZONA	71	60	58	0	40	55
ARKANSAS	46	0	66	0	0	54
CALIFORNIA	58	57	69	0	30	56
CANAL ZONE						-
COLORADO	63	66	68	0	34	53
CONNECTICUT	44	44	48	0	0	45
DELAWARE	42	16	0	18	33	33
DISTRICT OF COLUMBIA	32	0	93	0	42	37
FLORIDA	54	26	64	77	28	62
GEORGIA	48	59	55	5	62	54
GUAM	31	0	0	0	0	31
HAWAII	91	88	72	0	0	74
IDAHO	47	0	66	0	0	60
ILLINOIS	37	60	27	31	55	36
INDIANA	42	41	62	0	51	49
IOWA	37	10	94	0	17	41
KANSAS	33	48	79	0	0	64
KENTUCKY	56	0	62	0	0	57
LOUISIANA	53	51	62	0	20	54
MAINE	56	0	72	0	50	64
MARYLAND	47	0	68	0	0	61

Table C4, Page 1

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE VII (PSIP) ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Table C4, Page 2

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
MASSACHUSETTS	60	57	80	21	90	62
MICHIGAN	43	32	61	25	39	49
MINNESOTA	45	56	75	69	50	61
MISSISSIPPI	17	45	65	0	50	40
MISSOURI	69	57	68	50	54	67
MONTANA	0	36	70	0	50	39
NEBRASKA	42	42	78	0	0	43
NEVADA	66	42	84	0	0	68
NEW HAMPSHIRE	51	0	89	0	0	80
NEW JERSEY	54	44	65	25	47	49
NEW MEXICO	35	0	64	0	65	59
NEW YORK	56	52	74	20	96	60
NORTH CAROLINA	58	17	67	50	83	62
NORTH DAKOTA						
OHIO	37	22	58	12	39	36
OKLAHOMA	73	26	61	0	75	63
OREGON	54	57	64	33	50	56
PENNSYLVANIA	52	60	60	0	40	56
PUERTO RICO	68	0	79	0	0	73
RHODE ISLAND	76	0	72	0	25	70
SOUTH CAROLINA	69	0	87	0	56	67
SOUTH DAKOTA	58	57	79	0	0	61
TENNESSEE	37	55	60	0	54	52
TEXAS	68	52	64	0	74	65

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

CETA TITLE VII (PSIP) ENTERED EMPLOYMENT RATES BY ACTIVITY CATEGORY FY 1981
(BASED ON AGGREGATED DATA FOR PRIME SPONSORS WITHIN EACH STATE)

Tabe C4, Page 3

STATE	CLASSROOM TRAINING OCCUPATIONAL	CLASSROOM TRAINING OTHER	ON-THE-JOB TRAINING	WORK EXPERIENCE	SERVICES ONLY	TOTAL FOR ALL ACTIVITIES
UTAH						
VERMONT	25	0	83	0	0	74
VIRGINIA	60	41	59	0	33	52
VIRGIN ISLANDS	64	0	0	0	0	60
WASHINGTON	60	42	72	41	70	58
WEST VIRGINIA	83	78	80	0	0	79
WISCONSIN	62	0	80	62	92	77
WYOMING						
PROGRAM TOTAL	50	40	60	30	50	50

Table C4, Page 3

Table D1

CETA TITLE IIB/C PROGRAM STATUS AND FINANCIAL SUMMARY

October 1, 1981 - June 30, 1982

National Only

This table features program mix and cost information as well as planned versus actual State summary totals for enrollments and terminations. This is the same format as the table being furnished separately to each State aggregating all prime sponsor data reported for that State during the period shown. This program input data may be helpful in examining performance output figures presented elsewhere in the guide.

REPORT NO:92

Table D1, Page 1

PGM/COMP: CETA IIABC N/A

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
***** COMPONENT TOTALS ***
CETA PROGRAM STATUS & FINANCIAL SUMMARY
PAGE 1 OF 2

PAGE 938

DATA AS OF 02-01-83

I. PARTICIPATION AND TERMINATION SUMMARY	PLANNED DATA FOR QUARTER ENDING 06-30-82	ACTUAL DATA FOR QUARTER ENDING 06-30-82	ACTUAL DATA AS A PERCENT OF PLANNED
A. TOTAL PARTICIPANTS	667,622	690,202	103.3
1. NEW PARTICIPANTS	431,318	449,013	104.1
2. TRANSFERS FROM OTHER SUBPARTS	22,020	21,290	96.6
3. PARTICIPANTS CARRIED OVER	214,284	219,899	102.6
B. TOTAL TERMINATIONS	393,326	395,285	100.4
1. ENTERED UNSUBSIDIZED EMPLOYMENT	189,190	183,473	96.9
A. DIRECT PLACEMENT	29,437	29,531	100.3
B. INDIRECT PLACEMENT: (1) THRU SPONSOR	111,311	101,582	91.2
(2) OTHER INDIRECT	48,442	52,360	108.0
2. TRANSFERS TO OTHER SUBPARTS	27,677	33,575	121.3
3. ADDITIONAL POSITIVE TERMINATIONS	62,662	57,383	91.5
A. RET. TO/CONTINUE FULL TIME SCHOOL	28,070	26,073	92.8
4. OTHER TERMINATIONS	113,797	120,854	106.2
C. TOTAL CURRENT PARTICIPANTS (END OF QUARTER)	274,296	294,917	107.5
1. ACTIVE NON-PSE PARTICIPANTS (II-D OR VI)	595	3,003	504.7
II. SPECIAL CATEGORIES			
A. UNSUBSIDIZED PRIVATE SECTOR PLACEMENTS	147,296	152,455	103.5
B. TITLE II-C:(1) UPGRADING	4,107	3,125	76.0
(2) RETRAINING	1,194	1,216	101.8
C. TITLE IV: (1) GED CERTIFICATE	165	252	152.7
(2) ACADEMIC CREDIT	196	196	100.0
(3) SPECIAL MIX. COMP.(YETP)	0	0	.0
(4) LIMITED SERVICES (YETP)	3,100	0	.0
D. SYEP: (1) VOCATIONAL EXPLORATION PROGRAM	200	190	95.0
(2) SUMMER ENTITLEMENT PROGRAM	0	0	.0
(3) CONCURRENT PART. IN: A. II B/C	732	439	59.9
B. YETP	0	4	.0
C. YCCIP	0	0	.0

III PARTICIPATION IN PROGRAM ACTIVITIES	CUM PLN	CUM ACT	CUM PER	CURR PLN	CURR ACT	CURR PER
A. CLASSROOM TRAINING (OCCUPATION SKILLS)	230,218	241,581	104.9	77,931	95,185	122.1
B. CLASSROOM TRAINING (OTHER)	92,071	95,359	103.5	20,086	24,091	119.9
C. ON THE JOB TRAINING	87,565	76,630	87.5	30,378	27,823	91.5
D. WORK EXPERIENCE (IN SCHOOL)	67,857	68,065	100.3	21,261	22,667	106.5
E. WORK EXPERIENCE (OTHER)	124,835	131,594	105.4	40,355	51,976	128.7
F. PUBLIC SERVICE EMPLOYMENT (II-D OR VI)	649	823	126.8	177	175	98.8
1. PSE PARTICIPANTS IN TRNG/SERVICES	0	0	.0	0	0	.0
G. CAREER EMPLOYMENT EXPERIENCE (YETP)	412	232	56.3	42	93	221.4
H. TRANSITION SERVICES (YETP)	1,451	758	52.2	327	105	32.1

Table D1
Page 1

REPORT NO:92 **Table D1, Page 2**

PGM/COMP: CETA IIABC N/A

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
***** COMPONENT TOTALS ***
CETA PROGRAM STATUS & FINANCIAL SUMMARY
PAGE 2 OF 2

DATA AS OF 02-01-83

	TOTAL			YETP IN-SCHOOL		
I. SUMMARY OF ACTIVITY	PLANNED DATA FOR QTR ENDING 06/82	ACTUAL DATA FOR QTR ENDING 06/82	ACTUAL/ PLANNED	PLANNED DATA FOR QTR ENDING 06/82	ACTUAL DATA FOR QTR ENDING 06/82	ACTUAL/ PLANNED
TOTAL FUNDS AVAILABLE	1,278,717.00	1,405,583,202.67	921.3	.00	.00	.0
TOTAL CETA FUNDS EXPENDED	62,977,350.00	975,185,192.67	548.4	.00	.00	.0
1. ADMINSTRATION	75,921.00	292,292.42	384.9	.00	.00	.0
2. ALLOWANCES	25,309,679.00	267,773,792.29	57.9	.00	.00	.0
3. WAGES	9,365,571.00	191,455,086.78	44.2	.00	.00	.0
4. FRINGE BENEFITS	892,330.00	18,949,900.79	123.6	.00	.00	.0
5. WORK-SITE SUPERVISION	13,705,749.00	.00	.0	.00	.00	.0
6. TRAINING	779,650.00	225,659,708.77	943.7			
7. SERVICES	12,848,480.00	271,054,411.62	.0			
II. STATUS OF FUNDS						
1. TOTAL EXPENDITURE BY PROGRAM	1,059,420,611.00	975,185,192.67	92.0			
A. CLASSROOM TRAINING (P. S.)	519,598,054.00	483,512,043.10	93.0			
B. ON-THE-JOB TRAINING	64,529,420.00	84,074,360.60	130.2			
C. (1) PSE SUBSID. EMPLOYMENT	.00	175,291.00	.0			
(2) PSE TRNG. WAGES/FRINGES	.00	.00	.0			
(3) PSE SERVICES WAGES/FRINGES	.00	.00	.0			
(4) PSE TRAINING. COSTS	56,690,998.00	.00	.0			
(5) PSE SERVICES. COST	53,031,546.00	.00	.0			
D. WORK EXPERIENCE	163,311,020.00	259,571,635.13	158.9			
E. SERVICES TO PARTICIPANTS	192,691,895.00	143,515,032.01	74.4			
F. OTHER ACTIVITIES	7,953,543.00	3,279,353.04	41.2			
G. CAREER EMPLOYMENT EXPERIENCE	183,837.00	136,605.22	74.3			
H. TRANSITION SERVICES	161,524.00	190,542.57	117.9			
I. VOCATIONAL EXPLORATION PROGRAM	152,396.00	730,330.00	479.2			
J. ENTITLEMENT	1,116,378.00	.00	.0			
2. EXPENDITURE OF NON-FED FUNDS	2,131,809.00	1,959,520.07	91.9			
3.A. UPGRADING	5,657,148.00	4,265,347.64	75.3			
B. RETRAINING	2,235,681.00	1,282,351.10	57.3			

Table D1
Page 2

Table D2

SUMMARY OF PARTICIPANT CHARACTERISTICS FOR CETA IIB/C PROGRAMS

October 1, 1981 to June 30, 1982

National Only

This table features demographic characteristics information on CETA IIB/C enrollments and terminations including quantitative levels of enrollments, terminations, and entered employment by specific groups. This report can be of use in deriving relationships among the rates for various client groups for enrollments versus terminations versus entered employment. This is the same format as the table being furnished separately to each State which aggregates all prime sponsor data reported for that State during the period shown.

REPORT NO: 94 **Table D2, Page 1**

U.S. DEPARTMENT OF LABOR
EMPLOYMENT & TRAINING ADMINISTRATION

PROGRAM: CETA IIABC
COMPONENT:
REGION: STATE:

QUARTERLY SUMMARY OF PARTICIPANT CHARACTERISTICS

PAGE 1 OF 2

FOR QUARTER ENDING: 06/30/82
DATA AS SUBMITTED THRU: 02/01/83

****PROGRAM TOTALS****

CHARACTERISTIC:	PARTICIPANTS NUMBER	PARTICIPANTS PERCENT	TERMINATIONS NUMBER	TERMINATIONS PERCENT	ENTERED EMPLOYMENT NUMBER	ENTERED EMPLOYMENT PERCENT
TOTAL	692,796	100.0	396,832	100.0	184,151	100.0
SEX						
MALE	336,525	48.6	196,486	49.5	93,774	50.9
FEMALE	356,271	51.4	200,346	50.5	90,377	49.1
AGE						
14 - 15	22,092	3.2	12,367	3.1	1,053	0.6
16 - 19	167,184	24.1	97,598	24.6	32,579	17.7
20 - 21	93,124	13.4	53,393	13.6	25,831	14.0
22 - 44	363,623	52.5	206,217	52.0	110,653	60.1
45 - 54	30,349	4.4	17,373	4.4	9,061	4.9
55 & OVER	16,424	2.4	9,384	2.4	4,954	2.7
EDUCATION STATUS						
SCHOOL DROPOUT	208,388	30.1	121,115	30.5	53,235	28.9
STUDENT (H.S. OR LESS)	83,825	12.1	49,938	12.6	7,196	3.9
H.S. GRAD, NO POST H.S.	291,235	42.0	164,651	41.5	89,086	48.4
POST H.S. ATTENDEE	109,348	15.8	61,128	15.4	34,634	18.8
PUBLIC ASST. STATUS						
RECEIVING AFDC (SSA TIT IV)	147,036	21.2	81,239	20.5	28,805	15.6
RECEIVING SSI (SSA TIT XVI)	21,397	3.1	12,162	3.1	4,189	2.3
TOTAL RECEIVING PUB ASST	199,263	28.8	110,110	27.7	40,225	21.8
ECONOMIC STATUS						
OMB POV. LEVEL OR 70% LLSIL	663,744	95.8	379,865	95.7	175,610	95.4
71% THRU 85% OF LLSIL	5,062	0.7	3,063	0.8	1,460	0.8
86% THRU 100% OF LLSIL	3,357	0.5	2,112	0.5	1,154	0.6
ABOVE 100% OF LLSIL	10,672	1.5	5,820	1.5	2,836	1.5
ECONOMICALLY DISADVANTAGED	686,398	99.1	393,328	99.1	181,857	98.8
FAMILY STATUS						
SINGLE PARENT	145,520	21.0	81,898	20.6	38,875	21.1
PARENT IN TWO-PARENT FAMILY	113,646	16.4	62,376	15.7	34,438	18.7
OTHER FAMILY MEMBER	181,431	26.2	105,406	26.6	36,457	19.8
NON-DEPENDENT INDIVIDUAL	252,199	36.4	147,152	37.1	74,381	40.4
RACE/ETHNIC GROUP						
WHITE (NOT HISPANIC)	358,420	51.8	205,715	51.8	100,893	54.8
BLACK (NOT HISPANIC)	219,324	31.7	124,120	31.3	50,613	27.5
HISPANIC	85,007	12.3	47,957	12.1	23,131	12.6
AMER IND OR ALASKAN NATIVE	9,865	1.4	5,420	1.4	2,050	1.1
ASIAN OR PACIFIC ISLANDER	25,180	3.6	13,620	3.4	7,464	4.1

Table D2
Page 1

REPORT NO: 99 **Table D2, Page 2**

U.S. DEPARTMENT OF LABOR
EMPLOYMENT & TRAINING ADMINISTRATION

PROGRAM: CETA IIABC
COMPONENT:
REGION: STATE:

QUARTERLY SUMMARY OF PARTICIPANT CHARACTERISTICS

PAGE 2 OF 2

FOR QUARTER ENDING: 06/30/82
DATA AS SUBMITTED THRU: 02/01/83

****PROGRAM TOTALS****

CHARACTERISTIC:	PARTICIPANTS NUMBER	PARTICIPANTS PERCENT	TERMINATIONS NUMBER	TERMINATIONS PERCENT	ENTERED EMPLOYMENT NUMBER	ENTERED EMPLOYMENT PERCENT
LIMITED ENGLISH SPEAKING	41,073	5.9	22,379	5.6	11,486	6.2
MIGRANT OR SEAS FARM FAM. MEM	5,282	0.8	3,155	0.8	1,504	0.8
VETERAN GROUP						
VETERAN	60,627	8.8	35,367	8.9	19,888	10.8
VIETNAM-ERA (AGE 34 OR LESS)	23,641	3.3	13,519	3.4	7,578	4.1
SPECIAL DISABLED	2,591	0.4	1,267	0.3	635	0.3
HANDICAPPED	67,081	9.7	37,790	9.5	15,069	8.2
OFFENDER	65,893	9.5	40,114	10.1	18,268	9.9
DISPLACED HOMEMAKER	39,494	5.7	22,773	5.7	9,223	5.0
IN-SCHOOL	94,843	13.7	52,096	13.1	8,614	4.7
LABOR FORCE STATUS						
UNDEREMPLOYED	26,752	3.9	14,395	3.6	8,226	4.5
UNEMPLOYED	557,584	80.5	316,114	79.7	156,791	85.1
OTHER	108,468	15.7	66,323	16.7	19,134	10.4
UNEMP. COMP. CLAIMANT	52,307	7.6	28,471	7.2	17,390	9.4
TJTC ELIGIBLE	44,225	6.4	27,734	7.0	14,283	7.8

WAGE GAIN OF TERMINEES ENTERING EMPLOYMENT	PRE-CETA HOURLY WAGE	POST-CETA HOURLY WAGE	NUMBER OF TERMINEES
PARTICIPANTS- NO PREVIOUS WAGE		4.29	72,615
PARTICIPANTS- W/ PREVIOUS WAGE	3.98	4.39	93,242

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Table D2
Page 2

Table D3

CETA TITLE VII (PSIP) PROGRAM STATUS AND FINANCIAL SUMMARY

October 1, 1981 - June 30, 1982

National Only

This table presents program mix and cost information as well as planned versus actual State summary totals for enrollments and terminations. This is the same format as the table being furnished separately to each State aggregating all prime sponsor data reported for that State during the period shown. This program input data may be helpful in examining performance output figures referred to elsewhere in the guide.

REPORT NO-92
Table D3, Page 1
PGM/COMP: PSIP N/A

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
***** COMPONENT TOTALS ***
CETA PROGRAM STATUS & FINANCIAL SUMMARY
PAGE 1 OF 2

DATA AS OF 02-01-83

I. PARTICIPATION AND TERMINATION SUMMARY	PLANNED DATA FOR QUARTER ENDING 06-30-82	ACTUAL DATA FOR QUARTER ENDING 06-30-82	ACTUAL DATA AS A PERCENT OF PLANNED
A. TOTAL PARTICIPANTS	92,575	96,916	104.6
1. NEW PARTICIPANTS	56,743	59,669	105.1
2. TRANSFERS FROM OTHER SUBPARTS	11,074	11,576	104.5
3. PARTICIPANTS CARRIED OVER	24,758	25,671	103.6
B. TOTAL TERMINATIONS	58,742	59,768	101.7
1. ENTERED UNSUBSIDIZED EMPLOYMENT	33,618	32,636	97.0
A. DIRECT PLACEMENT	4,846	5,188	107.0
B. INDIRECT PLACEMENT: (1) THRU SPONSOR	22,014	20,551	93.3
(2) OTHER INDIRECT	6,758	6,897	102.0
2. TRANSFERS TO OTHER SUBPARTS	5,407	6,386	118.1
3. ADDITIONAL POSITIVE TERMINATIONS	4,881	4,376	89.6
A. RET. TO/CONTINUE FULL TIME SCHOOL	1,507	1,280	84.9
4. OTHER TERMINATIONS	14,836	16,370	110.3
C. TOTAL CURRENT PARTICIPANTS (END OF QUARTER)	33,833	37,148	109.7
1. ACTIVE NON-PSE PARTICIPANTS (II-D OR VI)	1,363	138	10.1
II. SPECIAL CATEGORIES			
A. UNSUBSIDIZED PRIVATE SECTOR PLACEMENTS	30,320	30,151	99.4
B. TITLE II-C: (1) UPGRADING	2,186	2,342	107.1
(2) RETRAINING	1,068	721	67.5
C. TITLE IV: (1) GED CERTIFICATE	68	2	2.9
(2) ACADEMIC CREDIT	0	0	.0
(3) SPECIAL MIX. COMP. (YETP)	0	0	.0
(4) LIMITED SERVICES (YETP)	0	0	.0
D. SYEP: (1) VOCATIONAL EXPLORATION PROGRAM	48	44	91.6
(2) SUMMER ENTITLEMENT PROGRAM	0	0	.0
(3) CONCURRENT PART. IN: A. II B/C	0	1	.0
B. YETP	0	2	.0
C. YCCIP	0	0	.0

III PARTICIPATION IN PROGRAM ACTIVITIES	CUM PLN	CUM ACT	CUM PER	CURR PLN	CURR ACT	CURR PER
A. CLASSROOM TRAINING (OCCUPATION SKILLS)	33,650	34,787	103.3	10,667	12,751	119.5
B. CLASSROOM TRAINING (OTHER)	10,282	11,216	109.0	1,957	2,230	113.9
C. ON THE JOB TRAINING	31,293	29,628	94.6	10,564	11,972	113.3
D. WORK EXPERIENCE (IN SCHOOL)	239	310	129.7	81	261	322.2
E. WORK EXPERIENCE (OTHER)	1,523	2,253	147.9	414	842	203.3
F. PUBLIC SERVICE EMPLOYMENT (II-D OR VI)	27	0	.0	0	0	.0
1. PSE PARTICIPANTS IN TRNG/SERVICES	0	0	.0	0	0	.0
G. CAREER EMPLOYMENT EXPERIENCE (YETP)	110	104	94.5	0	20	.0
H. TRANSITION SERVICES (YETP)	405	273	67.4	112	41	36.6

Table D3
Page 1

REPORT NO:92

Table D3, Page 2

PCN/COMP: PSIP N/A

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
***** COMPONENT TOTALS ***
CETA PROGRAM STATUS & FINANCIAL SUMMARY
PAGE 2 OF 2

DATA AS OF 02-01-83

	TOTAL			YETP IN-SCHOOL		
I. SUMMARY OF ACTIVITY	PLANNED DATA FOR QTR ENDING 06/82	ACTUAL DATA FOR QTR ENDING 06/82	ACTUAL/ PLANNED	PLANNED DATA FOR QTR ENDING 06/82	ACTUAL DATA FOR QTR ENDING 06/82	ACTUAL/ PLANNED
TOTAL FUNDS AVAILABLE	54,237.00	220,216,715.43	26.7	.00	.00	.0
TOTAL CETA FUNDS EXPENDED	10,319,346.00	142,662,500.76	382.4	.00	.00	.0
1. ADMINSTRATION	.00	47,263.00	.0	.00	.00	.0
2. ALLOWANCES	2,363,710.00	29,407,766.48	244.1	.00	.00	.0
3. WAGES	63,151.00	2,783,078.88	407.0	.00	.00	.0
4. FRINGE BENEFITS	4,028.00	542,058.49	457.2	.00	.00	.0
5. WORK-SITE SUPERVISION	4,933,370.00	.00	.0	.00	.00	.0
6. TRAINING	.00	60,260,220.94	.0			
7. SERVICES	2,954,579.00	49,622,112.97	.0			
II. STATUS OF FUNDS						
1. TOTAL EXPENDITURE BY PROGRAM	158,790,411.00	142,662,500.76	89.8			
A. CLASSROOM TRAINING (P. S.)	72,627,856.00	68,615,341.52	94.4			
B. ON-THE-JOB TRAINING	22,776,464.00	30,230,890.98	132.7			
C. (1) PSE SUBSID. EMPLOYMENT	.00	.00	.0			
(2) PSE TRNG. WAGES/FRINGES	.00	6,908.00	.0			
(3) PSE SERVICES WAGES/FRINGES	.00	.00	.0			
(4) PSE TRAINING. COSTS	16,342,195.00	.00	.0			
(5) PSE SERVICES. COST	7,316,397.00	100,669.00	1.3			
D. WORK EXPERIENCE	745,379.00	1,768,562.18	237.2			
E. SERVICES TO PARTICIPANTS	15,898,758.00	21,561,352.47	135.6			
F. OTHER ACTIVITIES	22,003,594.00	19,394,676.52	88.1			
G. CAREER EMPLOYMENT EXPERIENCE	75,417.00	28,797.00	38.1			
H. TRANSITION SERVICES	40,805.00	429,302.09	52.0			
I. VOCATIONAL EXPLORATION PROGRAM	786,546.00	526,001.00	66.8			
J. ENTITLEMENT	177,000.00	.00	.0			
2. EXPENDITURE OF NON-FED FUNDS	48,223.00	5,245.00	10.8			
3.A. UPGRADING	3,513,172.00	2,729,079.36	77.6			
B. RETRAINING	1,337,189.00	690,770.18	51.6			

Table D3
Page 2

Table D4

SUMMARY OF PARTICIPANT CHARACTERISTICS FOR CETA TITLE VII PROGRAMS

October 1, 1981 - June 30, 1982

National Only

This table presents demographic characteristics information on CETA Title VII (PSIP) program enrollments and terminations including quantitative levels of enrollments, terminations, and entered employment by specific groupings. This report can be of use in deriving relationships among the rates for various client groups for enrollments versus terminations versus entered employment. This is the same format as the table being furnished separately to each State which aggregates all prime sponsor data reported for that State during the period shown.

REPORT NO: 94 Table D4, Page 1

U.S. DEPARTMENT OF LABOR
EMPLOYMENT & TRAINING ADMINISTRATION

PROGRAM: PSIP
COMPONENT: N/A
REGION: STATE:

QUARTERLY SUMMARY OF PARTICIPANT CHARACTERISTICS

FOR QUARTER ENDING: 06/30/82
DATA AS SUBMITTED THRU: 02/01/83

PAGE 1 OF 2

COMPONENT TOTALS

CHARACTERISTIC:	PARTICIPANTS		TERMINATIONS		ENTERED EMPLOYMENT	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
TOTAL	96,705	100.0	59,601	100.0	32,573	100.0
SEX						
MALE	53,538	55.4	33,001	55.4	18,721	57.5
FEMALE	43,167	44.6	26,600	44.6	13,852	42.5
AGE						
14 - 15	754	0.8	344	0.6	34	0.1
16 - 19	16,836	17.4	10,107	17.0	5,105	15.7
20 - 21	13,944	14.4	8,750	14.7	4,905	15.1
22 - 44	59,333	61.4	36,763	61.7	20,537	63.0
45 - 54	4,278	4.4	2,629	4.4	1,440	4.4
55 & OVER	1,560	1.6	1,008	1.7	549	1.7
EDUCATION STATUS						
SCHOOL DROPOUT	25,543	26.4	16,618	27.9	8,230	25.3
STUDENT (H.S. OR LESS)	4,822	5.0	2,509	4.2	1,006	3.1
H.S. GRAD, NO POST H.S.	47,174	48.8	29,087	48.8	16,377	50.3
POST H.S. ATTENDEE	19,166	19.8	11,387	19.1	6,960	21.4
PUBLIC ASST. STATUS						
RECEIVING AFDC (SSA TIT IV)	16,054	16.6	9,832	16.5	4,540	13.9
RECEIVING SSI (SSA TIT XVI)	2,516	2.6	1,531	2.6	753	2.3
TOTAL RECEIVING PUB ASST	23,120	23.9	13,962	23.4	6,501	20.0
ECONOMIC STATUS						
OMB POV. LEVEL OR 70% LLSIL	91,766	94.9	56,893	95.5	30,761	94.4
71% THRU 85% OF LLSIL	910	0.9	488	0.8	267	0.8
86% THRU 100% OF LLSIL	691	0.7	463	0.8	285	0.9
ABOVE 100% OF LLSIL	3,360	3.5	1,782	3.0	1,289	4.0
ECONOMICALLY DISADVANTAGED	93,395	96.6	57,773	96.9	31,193	95.8
FAMILY STATUS						
SINGLE PARENT	19,974	20.7	12,651	21.2	6,294	19.3
PARENT IN TWO-PARENT FAMILY	18,636	19.3	11,280	18.9	6,754	20.7
OTHER FAMILY MEMBER	18,388	19.0	11,002	18.5	5,777	17.7
NON-DEPENDENT INDIVIDUAL	39,707	41.1	24,660	41.4	13,740	42.2
RACE/ETHNIC GROUP						
WHITE (NOT HISPANIC)	50,706	52.4	31,116	52.2	17,724	54.4
BLACK (NOT HISPANIC)	32,471	33.6	20,568	34.5	10,283	31.6
HISPANIC	9,685	10.0	5,783	9.7	3,313	10.2
AMER IND OR ALASKAN NATIVE	1,072	1.1	630	1.1	332	1.0
ASIAN OR PACIFIC ISLANDER	2,771	2.9	1,504	2.5	921	2.8

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Table D4
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REPORT NO: 94 **Table D4, Page 2**
U.S. DEPARTMENT OF LABOR
EMPLOYMENT & TRAINING ADMINISTRATION
PAGE 1052

PROGRAM: PSIP
COMPONENT: N/A
REGION: STATE:

QUARTERLY SUMMARY OF PARTICIPANT CHARACTERISTICS

FOR QUARTER ENDING: 06/30/82
DATA AS SUBMITTED THRU: 02/01/83

PAGE 2 OF 2

COMPONENT TOTALS

CHARACTERISTIC:	PARTICIPANTS NUMBER	PARTICIPANTS PERCENT	TERMINATIONS NUMBER	TERMINATIONS PERCENT	ENTERED EMPLOYMENT NUMBER	ENTERED EMPLOYMENT PERCENT
LIMITED ENGLISH SPEAKING	3,366	3.4	1,872	3.1	1,166	3.6
MIGRANT OR SEAS FARM FAM. MEM	604	0.6	336	0.6	203	0.6
VETERAN GROUP						
VETERAN	11,460	11.9	7,236	12.1	4,269	13.1
VIETNAM-ERA (AGE 34 OR LESS)	4,908	5.1	3,084	5.2	1,792	5.5
SPECIAL DISABLED	603	0.6	397	0.7	160	0.5
HANDICAPPED	7,861	8.1	4,704	7.9	2,469	7.6
OFFENDER	9,849	10.2	5,968	10.0	3,053	9.4
DISPLACED HOMEMAKER	4,808	5.0	2,557	4.3	1,236	3.8
IN-SCHOOL	5,313	5.5	2,544	4.3	1,080	3.3
LABOR FORCE STATUS						
UNDEREMPLOYED	3,771	3.9	2,059	3.5	1,251	3.8
UNEMPLOYED	77,277	79.9	48,286	81.0	26,684	81.7
OTHER	15,657	16.2	9,256	15.5	4,718	14.5
UNEMP. COMP. CLAIMANT	9,026	9.3	5,419	9.1	3,322	10.2
TJTC ELIGIBLE	6,961	7.2	4,645	7.8	2,792	8.6

WAGE GAIN OF TERMINEES ENTERING EMPLOYMENT	PRE-CETA HOURLY WAGE	POST-CETA HOURLY WAGE	NUMBER OF TERMINEES
PARTICIPANTS- NO PREVIOUS WAGE		4.40	12,060
PARTICIPANTS- W/ PREVIOUS WAGE	4.22	4.60	17,396

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Table D4
Page 2

AN INTRODUCTION TO COMPETENCY-BASED EMPLOYMENT AND TRAINING PROGRAMMING FOR YOUTH UNDER THE JOB TRAINING PARTNERSHIP ACT

Prepared by:

Center for Employment and Income Studies
The Florence Heller Graduate School
Brandeis University
Waltham, Massachusetts 02254

FOREWORD

This document is a publication of the Center for Employment and Income Studies (CEIS), Brandeis University. Publication of this document is made possible by a contract from the U.S. Department of Labor (11-99-8-1879-33-41). The CEIS is a national clearinghouse of information on effective youth program practices, policy, and research. In this period of legislative transition from CETA to the new Job Training Partnership Act, dissemination of reliable information becomes an important first step in revitalizing youth programs in the United States. For further information on CEIS activities, services, and publications, write:

Andrew Hahn, Director
Center for Employment and Income Studies
Heller School
Brandeis University
Waltham, MA 02254

The purpose of this Guide is to provide an introduction to competency-based employment and training under the Job Training Partnership Act. The guide describes in general terms the steps Service Delivery Areas should take to implement competency-based employment and training systems for youth. It does not provide more detailed information on available competency systems.

Much effort from many people went into the production of this document. The principal author was Greg Druian; Rick Spill researched and wrote the Appendices. Alan Werner edited the document, with a great deal of assistance from Paul Clancey and Audrey Shelto. Our Brandeis colleagues Andrew Hahn and Erik Butler also provided assistance. Hugh Davies and Jim Wiggins of the U.S. Department of Labor both provided the impetus for the production of this document and rendered guidance along the way. Evelyn Ganzglass of the National Governors Association and Jeffrey Zornitsky of the Massachusetts Division of Manpower Affairs were also helpful.

Many sources of information were used in the preparation of this Guide, and many persons contributed useful ideas. Special acknowledgement is due to the authors of the following documents, however, for the key ideas that make up the substance of this Guide: "Benchmarking," A.L. Nellum and Associates; "Benchmarking: A State of the Art Review," Syracuse Research Corporation; "Benchmarking and Assessment: An Approach to Developing Youth Employment Competency," Technical Assistance and Training Corporation; "Career Passports: The Job Connection," National Institute for Work and Learning; "Consolidated Youth Employment Program: Promising Connections for Youth," Osoro and Associates; "Individualizing Service Delivery for Vocationally At-Risk Youth: A Guide for State Policy Makers," Consortium on Education for Employment; "Ready to Work: Using Competencies, Standards and Assessment to Meet Local Employer Needs," Northwest Regional Educational Laboratory; "Recognizing Learning Outcomes for Employment," Consortium on Education for Employment.

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PREFACE

The purpose of this document is to provide an introduction to competency-based employment and training for young people as envisioned under the recently enacted Job Training Partnership Act.

Under JTPA, the legislative intent is clearly a partnership at the local level designed to meet the needs of program participants and local employers. In that spirit, this Guide has been designed to be of assistance to those playing key roles in JTPA implementation. While this document focuses more on the role of those directly responsible for developing youth programs under JTPA, such as SDA and direct service management and staff, it will be of use to other key actors, as well. This includes the Governor's employment and training staff, Private Industry Councils (PICs), and other agencies supporting SDA efforts.

The Guide is designed to introduce practitioners to the main concepts and practices of competency-based employment and training for young people. The content is based on the experiences of practitioners, and it is intended as a working introduction to major issues in the design, operation, and management of competency-based programs.

In an era of shifting public resources, competency-based employment and training represents an opportunity to target resources more efficiently and to enhance the overall effectiveness of programs. Competency-based employment and training can be an exciting way to bring together sound, commonsense approaches to preparing youth for success in the workplace. The concepts presented here have been used by practitioners in many different contexts; they can be applied with equal success to youth employment and training programming.

There are some objectives that this guide is not designed to meet. The guide is not a "cookbook" with direct, specific instructions for the development of a competency-based system. It does not, for example, suggest that practitioners use a particular type of assessment instrument for a given competency. Rather, it describes the variety of tools available and leaves considerable room for discretion at the local level. This guide is but the first step in the development of youth employment competencies, just as first steps are being taken for all aspects of the JTPA performance standards process.

PART I: INTRODUCTION

Section 1: Background

A. JPTA Legislation and Regulations

THE INTRODUCTION EXPLAINS THE CONTEXT OF COMPETENCY-BASED EMPLOYMENT AND TRAINING FOR YOUTH UNDER JTPA; IT ALSO PROVIDES AN ORIENTATION TO THE CONCEPT OF COMPETENCY-BASED EMPLOYMENT AND TRAINING; AND IT OUTLINES THE ADVANTAGES OF THE COMPETENCY-BASED APPROACH

The recently enacted Job Training Partnership Act (JTPA) provides a new program and delivery system to train economically disadvantaged persons and others for permanent employment. Consistent with the intent of Congress, the Act provides maximum local authority and flexibility at the state and local levels in the design and administration of programs. Furthermore, the Congress has recognized that as an investment in human capital, job training must be measured against criteria to help determine whether the investment has been productive. As a result, the Secretary of Labor has been directed to establish performance standards for JTPA programs, including programs serving youth. This Guide relates directly to Regulation 629.46(a) and to the U. S. Department of Labor's administrative issuance on performance standards.

Among the factors specified in the legislation as appropriate measures of program success is the attainment by program participants of employment competencies recognized by the local Private Industry Council.

This Guide is written to provide background information, sample activities and techniques, and suggested resources which could be used by those having the responsibility for planning and implementing competency-based employment and training programs for youth under JTPA. This guide is primarily intended for staff of Service Delivery Areas (SDAs) and private industry council (PIC) members who will be playing key roles in the planning and design of youth programs. But it is also written for anyone who will be involved in the partnerships through which JTPA will be carried out. This might include:

- staff of Governors' offices
- Other staff of Service Delivery Areas (SDAs)
- staff of agencies operating youth programs

Within this document, the reader will find an introductory discussion of competency-based employability development planning for young people, with emphasis on:

- working with local business to develop youth competencies;
- developing "indicators" and "benchmarks" of competency attainment;
- assessing competency attainment;
- targeting program services to identified competencies;
- certifying and recording competency attainment.

It should be clear that competency-based employment and training offers an important opportunity for reconceptualizing services to youth. This reconceptualization will provide the opportunity for the more effective targeting of program resources, for tailoring programs to individual needs, and for making programs more responsive to local employer standards.

B. Concept and Context of Competency-Based Employability Development for Youth

For some time now, practitioners in many fields have been experimenting with techniques for improving the learning process by carefully specifying what is to be learned, describing how it will be measured, and designing activities focused on producing the desired learning. These techniques have been helpful to young people engaged in different kinds of learning experiences.

Many public schools today have renewed emphasis on "basics," and are developing standardized, objective measures of "competence" which can be applied to grade completers and graduates. Vocational educators have long built instructional programs around specific, measurable skills which are needed in the workplace. In the employment and training system, several interesting approaches for training youth have been developed based on careful identification of skills youth need for success in the world of work. Some of the more noteworthy of these approaches were the Consolidated Youth Employment Program (CYEP), the Vocational Exploration Demonstration Project (VEDP), the Career Passport Project, the Skill Center Advanced Training and Employment Program (SCATE), and the Hartford Private Sector Training and Employment Program.

Standardized learning objectives are also used extensively and effectively in the private sector. Trainers in business and industry have found training to be more effective when subject matter is presented in specific, measurable terms.

DEFINITION OF COMPETENCY-BASED LEARNING

These techniques, with their focus on defining content to be learned, and the connected tasks of assessing what the learner knows and providing learning experiences which lead to the desired, defined outcome may all be referred to as variations on the concept of "competency-based learning."

The term "competency" is used to indicate a wide range of learnable outcomes. Skills, such as typing, assembling a carburetor, or describing career preferences; knowledge, such as an awareness of career options, understanding of sources of labor market information, or different kinds of academic knowledge; attitudes, such as positive regard for others, initiative, and willingness to assume the consequences of one's actions; and behavior are all examples of different kinds of competencies.

In the youth employment field, there is a growing recognition among practitioners that competency-based training approaches offer an important new dimension of effective programming. This belief is mirrored in the requirement of the JTPA that competency levels of youth be assessed, and that the specific kinds of competencies against which youth are assessed be certified by Private Industry Councils within each Service Delivery Area (SDA).

Under the Job Training Partnership Act, there are several goals for programs serving youth in addition to the traditional goals of placement and retention in unsubsidized employment. One of these goals is the attainment of employment competencies recognized by the Private Industry Council; another is the completion of elementary, secondary, or postsecondary education or its equivalent; and the third is enrollment in other training programs or apprenticeships, or enlistment in the armed services. Employment competencies are suggested to be of three kinds: (1) Pre-employment and Work Maturity Competencies, (2) Basic Educational Skills Competencies, (2) Basic Educational Skills Competencies, and (3) Job Specific Skills Competencies.

Three Suggested Competency Areas:

1. PRE-EMPLOYMENT AND WORK MATURITY
2. BASIC EDUCATIONAL SKILLS
3. JOB SPECIFIC SKILLS

1. Pre-employment and Work Maturity Competencies

Competencies in this area cover basic awareness of the world of work, including awareness of one's own preferences and interests, as well as demonstrated abilities to meet employer expectations of basic entry-level employee responsibilities, such as regular attendance, ability to carry out instructions, punctuality, and so forth.

> Sample Competency: The participant understands the process of a job interview. Practice interviews will demonstrate this competency.

2. Basic Education Skills Competencies

Basic educational competencies are the fundamental skills of reading, computation, and communication that are needed for successful functioning in the workplace; competencies in this area focus on the application of these skills to real work situations.

> Sample Competency: The participant will make correct change, as demonstrated by making no more than two (2) errors on the Money section of the Key Mathematics test.

3. Job Specific Skills Competencies

This competency area covers mastery of basic and advanced skills required for a chosen occupation or cluster of occupations.

> Sample Competency: The participant will frame a doorway for a house under construction, as demonstrated by an actual product sample.

Within each "competency area," specific competencies to be learned are to be set in each Service Delivery Area (SDA) in accord with the local labor market's demand.

Within a competency-based employment and training program, each participant is assessed at program entry to determine his or her level of competency attainment and deficiency. Based on the results of the assessment, services can be chosen which remedy the identified deficiencies and build upon evident strengths of the participant. It should be emphasized that assessment is not an end in itself; in order for a competency-based system to be meaningful, assessment must be tied to training and the remediation of competency deficits.

Furthermore, as the participant attains new competencies, a record certifying competency attainment can be developed which can serve as a "resume" for the participant in his or her search for a job, application to another educational institution, or enlistment into the military.

The remainder of this Guide will provide suggestions that will allow program planners and developers to get started with competency-based employability development planning. "Getting Started" may mean designing a new program from the ground up, or it may mean making adjustments to already existing modes of program planning and delivery. The suggestions and techniques contained in this Guide are not meant to imply that youth-serving programs need to be completely redesigned--yet one more time; instead the Guide tries to provide resources that can be used to make ongoing programs better.

The materials making up most of this Guide come from a diversity of sources, some or many of which may already be familiar to readers. Some readers may find the sources new and unfamiliar. For the latter, information is provided in the Resource Section which will allow you to become more familiar with organizations, agencies, and institutions which are involved with the competency-based movement.

The principal sources of most of the materials found in the guide are the following:

- the Comprehensive Youth Employment Program (CYEP) demonstration funded by the U.S. Department of Labor, 1978-1980;
- the amalgam of loosely related programs and practices that come under the heading Competency-Based Education;
- the Vocational Exploration Demonstration Program, also funded by the U.S. Department of Labor, 1978-1980;
- the career and vocational education "movements," especially Experience-Based Career Education, funded during the 1970s, and still ongoing in many places;
- the competency-based adult education movement, which resulted in a comprehensive understanding of adult literacy and the Adult Performance Level (APL) testing program;
- other individual programs such as SCATE in Springfield, MA; the HPSEAP in Hartford, CT; the Job Corps' TAR (Training Achievement Record);
- the growing use of performance-based training and staff development within the private sector.

With this broad background, one can easily imagine that competency-based employability development can be many things to many people. In many places, lack of clear definitions has prevented or at least inhibited program development. In this Guide, we will attempt to synthesize the best of these experiences in ways that are helpful to practitioners.

C. Advantages of a Competency-Based Approach

The advantages of building an employability development program around a competency-based approach are considerable. While the specific outcomes outlined below cannot be promised, they are at least intended to provide the reader with some indication of what is possible, what other practitioners have found, and what some reasons for giving the matter careful attention might be.

1. A competency-based approach can readily identify and address individual needs. Because assessment is targeted on the individual, and because services may be provided which specifically address skill needs as revealed by an assessment, individual needs are consistently the focus of program activities.

2. This approach fosters achievement by providing specific, attainable objectives which can be measured in terms that are clear both to the participant and to program staff.

3. A competency-based approach frequently increases motivation and interest in participation in services. Youth (and most adults as well) tend to respond positively to situations in which learning is determined by demonstration of a skill, rather than by length of time one has been in classroom or work situation.

4. A competency-based approach provides for a more realistic understanding of one's own skills, abilities, and preferences, since it is focused on what a person actually does.

5. Because competency-based approaches imply objective standards of achievement, they tend to have credibility both for youth and the community. Youth tend not to feel that they are victims of the whim of an unfriendly teacher or counselor.

6. Finally, competency-based approaches which are based on employer input tend to offer the individual a more realistic picture of the world of work and the job market.

Competency-based employment and training can provide a number of significant advantages to SDAs as well:

1. The chief advantage according to most practitioners who advocate competency-based employment and training is that it provides a clear picture of specific program outcomes, and it encourages the more efficient use of services available to youth.

2. The competency-based approach provides a common management framework for staff and delivery of services.

3. It allows different rates of achievement for individual youth.

4. It facilitates identification of staff development/training needs.

5. It provides for flexibility in evaluation; criteria other than placement may be used. It also allows for comparability among programs within a given SDA.

6. It increases program responsiveness to local labor market conditions and employer demands; furthermore, training is targeted to local criteria and curriculum may be developed to meet local needs.

7. Finally, competency-based employment and training increases credibility of JTPA programs and services with employers.

Summary

Competency-based employment and training offers an opportunity to help youth learn skills which employers themselves are looking for in entry level employees. Implementing competency-based programs may not require significant revision of SDA activities; however, it does provide for important new roles to be played by the PIC, and it encourages careful efforts in the development of locally relevant competencies.

The next section of Part I provides a more detailed discussion of the elements of a competency-based approach as an SDA might implement it under JTPA.

D. Roles and Responsibilities

The Job Training Partnership Act, in its legislation as well as in the Department of Labor's administrative regulations and guidelines, has substantially changed the balance of authority between federal, state, and local agencies that had existed under CETA. The new relationships among governmental units reflect a shift in authority and discretion to the states, leaving the bulk of the responsibility for administration and performance evaluation to the state and local areas. This section will review the roles and responsibilities assigned to the federal, state, and local jurisdictions in the development, implementation, and administration of competency-based youth employment and training programs. In addition, it will suggest areas in which the primary responsibility for a given task or function is open to discretion at the state or local levels.

1. The Federal Role

The federal role emphasizes oversight rather than direct administration and management. In general, this oversight role consists in ensuring conformance with the legislation mandating JTPA. There are some areas, however, in which the Employment and Training Administration, U.S. Department of Labor, has interpreted the legislation in the development of regulatory guidelines. One such area is in the development of performance standards for JTPA programs; in the legislation, the mandate for competency-based youth employment and training programs is a subsection of the article concerning performance standards. The guidelines themselves are available from the U.S. Department of Labor; they will be briefly summarized here.

The federal responsibility in the development of competency-based youth programs has been to establish the minimum requirements for such a system. This includes suggesting the basic framework of the three competency areas (pre-employment and work maturity skills, basic educational skills, job specific skills).

2. The State Role

As mentioned above, the intent of the federal government is to give the individual states maximum flexibility in the implementation of JTPA, within the suggested framework. It is not the purpose of this document to summarize all those areas in which the Governor and the Governor's employment and training council have authority in the implementation and administration of JTPA programs. We will outline below some suggested roles for the development and administration of competency-based employment and training programs.

Although not a legislative requirement, the state may decide that a certain degree of consistency between SDA-developed systems is desirable in order to assure portability of competency certification among SDAs within the state or within individual labor market areas of other geographic regions served by more than one SDA. This factor is very important if a goal is employer acceptance of the competency certifications.

Also, the state should consider providing PICs with assistance in developing workable competency standards and programs that can train youth in these competencies. This assistance could include staff training, on-site consultation in considering various options, as well as development of guidelines or actual prototype systems for PICs and SDAs to use in standard setting, and selection of assessment approaches and curriculum. A variety of state resources including state discretionary funds under the education coordination set-aside and state incentives grants may be used for this purpose.

3. The Private Industry Council

The JTPA legislation states that the PIC must certify its SDAs' competency-based system as one which reflects the standards of the local community. Beyond this basic requirement, the PIC will be expected to have an extensive involvement. As we strongly suggest elsewhere in this document, the PIC, as the representative of the local employers, education and state vocational education, and community will likely take an active role in the development of competencies, benchmarks, and assessment tools for its youth programs. In particular, collaboration between the local PIC and SDA program planners is essential to assure that local employer and educational needs are continually kept in mind during the process of competency development.

In addition to reaching a consensus with SDA staff on an acceptable set of competencies, the PIC should work closely with the SDA to ensure that programs are structured to adequately support the services needed to make the competency-based system work.

4. The SDA

Although there is no legislatively mandated role for the SDA in the development of a competency-based youth employment and training system (except, of course, that it must have one in place), the SDA will most likely be left with the major task of developing and implementing such a system. The major focus of this Guide is on this task.

Section 2: Elements of Competency-Based Employment and Training

Almost all program operators have used competency-based concepts at one time or another. The fundamental concepts are quite familiar to most people, and it is realistic and feasible to modify most employment and training programs for youth so that they can take advantage of the strengths of these concepts.

Staff of CETA youth programs often used competency-based concepts informally whenever they called upon some standard against which the performance of the CETA participant was measured. For example, if a participant was required to have a high school diploma or achieve a specific educational level, the standard was specific, public, and measurable, and thus quite consistent with the competency-based approach. When a worksite supervisor would require a trainee to report to work on time 90 percent of the days the trainee was scheduled to work, a specific standard for performance was also established. While these practices were consistent with a competency-based approach, they were often applied inconsistently to the variety of youth programs developed by a single prime sponsor, and they frequently were not based on a carefully planned assessment of participant and employer needs. Consequently the effectiveness of the approach for youth was somewhat diminished. It is the hope of those involved with the development of the JTPA legislation, as well as the hope of the developers of this Guide, that SDA staff will recognize the need to implement explicit, formal, and consistent application of competency-based approaches.

We have already looked quickly at the three competency areas; let us now take a closer look at the components of a competency-based system as they might be found in a youth employability development program.

COMPETENCY STATEMENTS

Consider the competency statement on the next page:

Competency Area: PREEMPLOYMENT AND WORK MATURITY

The participant will demonstrate an acceptable attendance pattern

by showing up on time nine days out of ten on his/her try-out employment placement

INDICATOR (OBJECTIVE)	as measured by employer attendance reports.

Fig. 1: Sample Competency Statement

ASSESSMENT
↓
SERVICES
↓
REASSESSMENT
↓
CERTIFICATION

PETENCY INDICATORS

In compentency statement above, the following elements are shown. First, the statement is in the general competency area of preemployment and work maturity. Second, there is a specific, observable behavior that is expected of the participant. In the CETA programs (especially the Consolidated Youth Employment Program [CYEP]) where many of these concepts were first tried out in an organized fashion, this specific, observable behavior tended to be called a competency indicator. That terminology will be retained in this document. Within a competency-based approach, a global competency area is seen to be made up of a collection of indicators which local employers believe to be critical to success in the workplace.

CHMARKS

The third element in the competency statement shown above is referred to in the diagram as a benchmark. The term benchmark emerged from early discussions of how to make employability skills measurable. In order for an indicator to be verifiable, it must be associated with a measurable standard of some kind.

ASSESSMENT

The fourth and final element concerns assessment. It is not enough to describe a measurable indicator unless there is some process for assessment that is also available. As a practical example, many youth programs encourage participants to develop the skill of making a positive impression on other people. At the same time, program planners are keenly aware of the lack of measurement instruments which can be used to determine whether a favorable impression is being made. In spite of these obstacles, planners need to be imaginative in developing a measure, whether direct or indirect, which can be used. Otherwise, assessment of the participant is left essentially to chance--and the entire purpose of the competency-based system is thwarted.

From the foregoing discussion, one can see how a competency statement could be developed for each of the three competency areas. Furthermore, for some indicators there may be more than one standard that is appropriate, given the stage of development of the youth.

SERVICES

From competency statements, which consist of indicators, benchmarks, and assessment mechanisms, we may now move to the substance of a competency-based system, namely, the services that are provided in response to needs revealed in an assessment.

Services which are available to youth should be related to assessment results. If assessment of a young person's background and skills shows that he or she is unable to perform simple numerical calculations, the young person should be afforded an opportunity to learn arithmetic skills. Services should also be designed to enhance strengths, as in the cases involving handicapped youth where it might be pointless to try to remediate certain handicaps.

CREDENTIALS; CERTIFICATION

The final component to be discussed in this Guide concerns credentials and certification.

Certification documents a young person's achievement according to a uniform set of competencies, indicators, and benchmarks designed to enable the youth to successfully enter and compete in the labor market. As the youth gains documentable competencies, it is clear that he or she is building a resume for the job search effort.

It stands to reason that if programs in a particular SDA are addressing educational or occupational skill areas for which established credentials exist (e.g., high school diploma or GED; apprenticeship certificate, etc.), design of the system should focus on indicators and benchmarks which lead to those credentials.

In other competency areas where there are not existing credentialling systems, programs should attempt to establish the validity of their systems so that they too will be accepted and used by prospective employers and educational institutions.

Summary

The key components of competency-based employment and training are competency statements (consisting of competencies, indicators, and benchmarks), assessment, services, and credentials.

Part II discusses how to get started developing and implementing a competency-based employment and training system for youth. In the first section, general development steps are discussed, and in succeeding sections, suggested activities are presented.

PART II: DEVELOPING AND IMPLEMENTING A COMPETENCY-BASED EMPLOYMENT AND TRAINING SYSTEM FOR YOUTH

Section 1. General Tasks

Overview

PART II BEGINS WITH A DESCRIPTION OF 10 GENERAL TASKS ASSOCIATED WITH IMPLEMENTING A COMPETENCY-BASED EMPLOYMENT AND TRAINING PROGRAM FOR YOUTH. THIS IS FOLLOWED BY SPECIFIC SUGGESTIONS FOR DEVELOPING EACH COMPONENT OF THE COMPETENCY-BASED SYSTEM

Practitioners have accumulated sufficient experience with the implementation of new programs generally, and with competency-based programs specifically, to make certain generalizations regarding issues SDAs will face in putting JTPA into practice.

Although the specific steps will vary considerably within each of the Service Delivery Areas (SDAs), the overall design of JTPA, along with past experiences of practitioners, suggest that there are identifiable general development and implementation steps that virtually every SDA will have to address. These steps, which will each be addressed in this Guide, are listed below:

1. Selection of Target Occupations

This step is concerned with the traditional emphasis the employment and training community places on labor market information. In the context of competency-based employment and training, this is a necessary beginning step which is intended to make certain that competencies are selected which relate to industries in which jobs are likely to be available.

2. Analysis of Jobs to Determine Skills Required, Tasks Performed, Equipment Used, and Performance Standards Used in the Industry

The purpose of this step is to gather specific information about jobs. It is recommended that onsite interviews with employers and first-line supervisors be the primary method of collecting this kind of information. By designing your program to help young people learn the specific skills you identify in this step, you will be laying the groundwork for success. (There are several resources available to assist you with this task. The Technical Assistance and Training Corporation has carried out analyses of certain occupations, and the version of Experience-Based Career Education Program developed by the Northwest

Regional Educational Laboratory has developed an intensive Learning Site Analysis process which can be adapted to assist SDA staff).

3. Develop Competency Statements for Each Competency Area

This step is perhaps the most important one in the process, for it is the one in which information about specific jobs will be translated into specific competencies which young people will be expected to master and which the services of your program will be aimed at fostering.

4. Develop Benchmarks (Appropriate Levels of Performance) for Each Competency Statement

Normally this step will be carried out as part of the process of developing competency statements. It is included here both to underscore its importance and to make explicit the need for carrying it out.

5. Design or Adapt an Assessment Strategy

The development of an effective assessment strategy involves determining what methods of assessment are available for identified competencies, and then determining which among available methods are desirable for your situation. The intent of this step is to encourage SDA planners to make every effort to choose assessment strategies and methods which are consistent with and relate to the competencies youth need for employment. The point is simple to state, but sometimes difficult to carry out in practice. As will be more thoroughly discussed below, the occasional lack of appropriate instruments, lack of instrumentation, variations among SDA goals and purposes, lack of trained staff, and lack of experience all conspire against successful assessment. Nevertheless, the outlook is not completely bleak; there are some existing assessment instruments which have been used successfully in youth employment and training programs. SDA staff who put time and effort into designing or adapting an assessment strategy to measure competency attainment will find it well worth the investment.

6. Validate Competency Statements and Benchmarks

This step will ensure that the intentions and expectations of local employers are being met within the competency development process.

7. Analyze Services to Determine Whether They Need to Be Adapted to Support Competency Attainment

The service mix supported by the SDA need not necessarily be completely reinvented. Often just some modifications or redirections of emphasis are all that is necessary. Involvement of services deliverers (program operators) in the competency development process may not only be the source of good ideas, it may also be the key to targeting services on the attainment of competencies. The main point here is that a competency-based system allows the service mix to be tailored to individual needs. Participants should only get the services they need and should progress within a system tied to the attainment of clearly defined competencies.

8. Develop Appropriate Documentation and Certification Systems

The potential of a competency-based approach for helping youth acquire a credential that has real meaning--both to the youth and to a potential employer--should not be ignored. Planning documents such as an Employability Development Plan are extremely useful in helping the youth track his or her progress. A certificate or credential is not only an excellent motivator; it also can be designed to contain information of direct relevance to employers, or to other personnel in institutions where the youth may choose to continue his or her training. This idea is not new to the employment and training community; the GED, for example, is one such credential.

9. Inform People and Communicate Widely

Throughout the process of developing and implementing your plan, you should keep people informed and communicate the results of your efforts. People who know about the effort are likely to participate in it; agencies with which your SDA is already involved--or agencies you would like to become more involved with--should be contacted on a regular basis. Competency-based employment and training can provide an especially effective vehicle for collaborating with schools.

10. Monitor the System and Revise It Periodically

The experience of CYEP and other demonstrations of competency-based systems showed that fully-developed models for implementation simply do not exist. As a result each program is of some extent opening new ground. The need, therefore, is critical for careful monitoring to determine whether the program is meeting its intended goals. Moreover the changing employment picture in many communities will necessitate revising and changing competencies--sometimes frequently. Nonetheless, the kinds of revisions that will need to be made will most likely not be earthshaking. They will instead be refinements, additions, and program redirections.

Summary

The chart below summarizes these ten steps which most SDAs may wish to follow in implementing competency-based employment and training for youth.

Select Occupations

1.

Analyze Tasks

2.

Develop Competency Statements

3.

Designate Indicators and Benchmarks

4.

Develop Assessment Strategy

5.

Validate Competencies Benchmarks

6.

Determine Appropriate Services for Youth

7.

Develop Documentation and Certification Systems

8.

Keep People Informed

9.

Monitor and Revise Periodically

10.

The next sections of Part II suggest in greater detail how to accomplish these tasks.

Section 2: Getting Specific

Overview

Section 2 discusses suggested activities for specific tasks involved in putting the elements of competency-based employment and training into place. This section is in five parts: Part A presents information about developing competency statements. Part B provides information about developing indicators and benchmarks. In Part C, material on assessment is presented; and Part D describes individualized planning as the mechanism for targeting services on the attainment of identified competencies. Finally, Part E discusses ways of certifying individual achievements.

A. Determining Local Employer Standards

ROLE OF PRIVATE INDUSTRY COUNCIL

The JTPA places substantial emphasis on both the establishment of standards for youth and the relevance of those standards to the local situation. While broad guidelines may be expected from the national office of the Department of Labor and the states, the clear intention of the legislation is that setting standards for employability in a service delivery area should be a state and local responsibility.

In practice this means that Service Delivery Area staff will generally need to work very closely with their Private Industry Councils, which have the legislative mandate to review and approve SDA plans.

WAYS OF WORKING WITH THE PIC

There are of course many possible roles to be played by the PICs. The PIC may be the appropriate institution for establishing initial contacts with the business community in the development of local employer standards. In some cases, PIC members will take an active role in the design and development of competency-based employment and training. In other cases, their role will be one of policy formulation and oversight. At a minimum, the PIC will have the responsibility of signing off on an SDA's plan for providing competency training.

Experience with the Consolidated Youth Employment Program (CYEP) demonstration showed that the best results were obtained when prime sponsor staff were able to establish individual contacts with employers. As a rule it was not effective to attempt to develop competency statements "in committee."

TING EMPLOYER
EMENT

Meaningful employer involvement can be generated if the following conditions can be met:

- Employers need to understand the purpose and the reasons for their involvement; otherwise they will not contribute their time to the effort.

- They also need to believe that participation is in their own best interest. This creates an incentive for the business community to join with SDAs in a meaningful, and not merely symbolic, way.

- Intermediary organizations such as the Chamber of Commerce can play a critical role in generating employer involvement.

- Clear expectations for all participants, as well as stated and realistic time commitments will also enhance involvement.

- Demonstrating the concept of partnership will encourage and motivate all participants. Private sector participants should be aware of participation on the part of representatives of educational institutions (and vice versa).

For most SDAs, it is reasonable to expect that the Private Industry Council (PIC) will be in a key position to facilitate cooperation and communication with employers. Given the expectation that private sector representatives on the PIC will be company executives or senior staff, it is probably unlikely that the PIC will actually develop competency statements. The actual work of competency development should be a clearly assigned task--either to an individual, to a consultant, or to a task group. The PIC then might support the effort in these kinds of ways:

- Suggesting businesses/industries which should be contacted for information or assistance.

- Enlisting cooperation through letters to company executives, business owners, personnel officers, and others.

- Offering suggestions for improving the process.

With advice and assistance from the PIC, a process can be developed to determine the competencies employers feel are critical for youth to have in order to succeed in entry-level employment.

FINDING OUT EMPLOYERS' VIEWS ABOUT CRITICAL COMPETENCIES FOR YOUTH

It is strongly suggested that a survey of employers be carried out in order to identify these competencies. The reason for this is that surveying employers will more likely assure that the competency list actually reflects local conditions, preferences, and practices.

The two most frequently used methods for surveying employers are mail-out surveys and telephone or in-person interviews. Mail-out surveys can be effective if there is strong PIC support. However, some of the CYEP demonstration sites had poor success with mail-out surveys and consequently SDAs employing this method should be especially careful to plan an effective survey strategy.

Telephone or in-person interviews offer the advantage of quick results. The disadvantages, of course, are that scheduling may be a problem, and interviews require a substantial amount of staff time, both on the part of the SDA and on the part of the employer. Again, careful planning can minimize the amount of time that is needed.

ISSUES AND SUGGESTED STRATEGIES

The following is a set of suggestions for dealing with issues that are likely to be commonly faced by SDAs in working with employers to determine the locally relevant competencies for employment.

1. Develop a clear statement of the purposes, goals, and objectives of a competency-based system of employment and training for youth. This will allow you to communicate your program to a variety of audiences.

2. Analyze the industries and occupations in your Service Delivery Area. This step is one with which most SDA staffs will have had considerable experience. The idea of analyzing the entry level requirements of jobs into specific, measurable competencies may be new, however.

3. Choose selected occupations for further study. Your choices should be based on some appropriate criteria, such as:

- size of work force
- rate of growth
- geographic location within service area
- importance of occupation within industry as a whole
- actual or potential labor markets for youth

4. Working with the PIC and using whatever other sources of information (e.g., the U.S. Employment Service and the state occupational information coordinating committee) are available and relevant in your area, determine a sample of employers to survey. The size of the sample will vary by area, of course; however you should make sure that the sample is representative.

5. Develop a survey strategy. Whether you use a mail-out survey or interviews, you should be aware that the contact with employers established in this step will be very important for future relationships with those employers. You should probably pay attention to the opportunities for such things as:

- establishing program visibility
- developing a future "market" for participants
- soliciting employer involvement in many aspects of program operation

Regardless of the method you use for data gathering (survey or interview), it is important to develop a plan for gathering data and instrumentation (forms or interview schedules) to use in the process.

Some suggestions for kinds of data to gather might be:

- types of occupations
- functions and tasks performed by workers in each occupation
- statements of specific abilities, knowledge, and skills required for each function
- statements of desirable aptitudes, personal traits

- where appropriate, the level of proficiency required for each ability, skill, or level of knowledge (e.g., eighth grade reading level or typing at 60 wpm)
- informal standards of performance or proficiency applied to the worker
- equipment, machinery, hardware and/or software used by worker; standards of proficiency
- other hiring requirements

There are of course numerous other questions that you could ask; however you should try to keep the interview or survey as brief as possible, while at the same time making sure that all needed information is obtained.

6. Review and analyze the data that are gathered. Categorize the data in terms of competencies related to the three competency areas:

- preemployment and work maturity
- basic skills
- vocational skills

It might be useful at this point to review the preliminary list with the PIC and enlist their guidance in prioritizing and selecting specific competencies for further development.

7. Plan for the next activity which involves using the information you have gathered to develop explicit competency statements that include indicators and benchmarks.

EXAMPLE LIST OF COMPETENCIES

A list of competencies that can be used as an example is presented below. This is not a complete list; however, it is presented to give those new to the concept of competency-based employment and training an idea of what a competency set might look like. It should be noted that anyone expecting to use such a list would need to add indicters and benchmarks as well as a method of assessment in order to do so.

I. Pre-Employment and Work Maturity Competencies

The participant . . .

A. Understands major conditions and factors influencing successful job experiences increasing job effectiveness.

B. Identifies career goals and how to achieve them based on personal and labor market information.

C. Has accurate knowledge of his or her own values, interests, and aptitudes.

D. Shows responsibility and dependability in carrying out assigned tasks.

E. Accepts guidance, criticism, and assignments from supervisor.

F. Shows willingness to work and develop more advanced skills.

G. Maintains constructive and proper relationships with other workers.

H. Plans and organizes his or her job responsibilities.

I. Demonstrates the ability to send clear messages and is able to correctly understand the messages of others.

II. Basic Educational Skills Competencies

The participant . . .

A. Demonstrates mathematical skills.

B. Speaks, reads, writes English at levels commensurate with age, schooling, and cultural environment.

C. Achieves educational promotions through the 12th grade and continues preparation toward the level required by occupational target(s).

III. Job Specific Skills Competencies

The participant . . .

A. Demonstrates skills required for entry-level employment in a given industry or for a chosen career.

Summary

The first set of tasks facing an SDA is to develop a statement of the competencies that local employers feel are necessary for youth to succeed in the job market. These competencies also should include those skills needed to enable the youth to continue formal education and training or to enter the military. The competency list should be an accurate reflection of the practices of local employers. The Private Industry Council (PIC) can provide an effective point of entry for contacts with employers.

The set of competencies that will emerge from this set of activities will not necessarily be refined--and that is the next task.

B. Developing Indicators and Benchmarks

Overview

The previous section discussed ways of working with local employers to identify competencies needed for successful entry into the local labor market. In this section, we turn to the task of using those identified competencies to build a set of competency indicators and benchmarks which will be the focus of programmatic activities for youth.

BENCHMARK
DEVELOPMENT;
ASSESSMENT

Before actually carrying out any of the activities suggested in this section, readers might wish to consult the next section, dealing with the assessment of levels of competency. The reason for this is that choosing competencies and choosing appropriate methods of competency assessment are interdependent activities. For purposes of clarity and organization, this document presents these two activities in successive sections. In practice, however, involved persons will need to be thinking about competency indicators, benchmarks, and assessment more or less simultaneously.

Review of Terminology

COMPETENCY AREAS

Before discussing actual steps, a brief review of terminology may be helpful. Under the Job Training Partnership Act, there are several goals for programs serving youth in addition to the traditional goals of placement and retention in unsubsidized employment. The first goal is the attainment of employment competencies recognized by the Private Industry Council; the second is the completion of elementary, secondary, or postsecondary education or its equivalent; and the third is enrollment in other training programs or apprenticeships, or enlistment in the armed services. Employment competencies are of three kinds, as has been discussed earlier: (1) Pre-employment and Work Maturity Competencies, (2) Basic Educational Skills Competencies, and (3) Job Specific Skills Competencies.

COMPETENCIES

Within each of these three areas, one may specify skills, knowledge, attitudes, and behaviors that participants are expected to demonstrate. Competencies result from the question, "What are the main skills, knowledge, attitudes, and behavior that a young person should have in order to successfully enter and stay in the work force in this particular community or area?" In general, the answer to this question will be the result of close consultation with the Private Industry Council and a broad cross-section of local employers. Competencies are most useful if they are presented in clear, brief, and simple language, as in the following examples:

Participants will demonstrate dependability.

Participants will demonstrate appropriate work attitudes

Participants will know sources of labor market information

But just stating that it is desirable for participants to "demonstrate dependability" can lead to difficulties. People demonstrate dependability in many different ways, and one person's definition may not be the same as another's. We have all encountered instances where counselors and employers have diametrically opposed views as to whether a young person is "dependable." It is necessary to generate agreement about what is meant by each competency, and one way to do this is to make sure that the statement of each competency includes an indicator which can show literally anyone what a person with that competency is able to do.

INDICATORS

Competency indicators define the specific behaviors that demonstrate development of a competency. For example, under the competency "Demonstrating career awareness," a participant might exhibit any of the following behaviors:

- naming careers available in the community
- describing careers of interest

- attending career fairs

- taking a career education class

Of course many other behaviors could be acceptable as indicators that the given competency had been attained. The point to remember is that a competency indicator describes observable and measurable behaviors which your program (and by extension the surrounding labor market area) will accept as evidence that the competency has been attained.

But even with clearly described indicators, it is important to agree on a measure of the degree to which the competency is to be demonstrated. For instance, a young person might indeed demonstrate dependability by showing up on time--but the competency statement is not very useful until we add a number or percentage that tells us how many times the participant is allowed to be late, e.g., participants will demonstrate dependability by showing up on time 80 percent of the days he or she is enrolled.

BENCHMARKS

The part of a competency statement that shows the extent to which the participant is expected to demonstrate a behavior is usually called a **benchmark.**

Using the three simple indicators above, samples of the benchmarks associated with them might be as follows:

- naming five careers available in the community

- gathering information about three careers at a local career fair

- achieving a passing grade in a ninth grade career education class.

You have probably begun to wonder whether you need to establish many different indicators and benchmarks for each competency. Most practitioners advise that doing so is a good idea because different youth may be at different levels of development. A gradation of benchmarks on the way toward competency attainment will clarify the specific goals expected of program participants, will serve to measure individual progress, and will establish a system of intermediate successes for the individual participant.

UNIQUE NATURE OF BENCHMARK DEVELOPMENT IN EACH SDA

This development of benchmarks and indicators is a process which will vary considerably from service delivery area to service delivery area. If you have conducted a survey of employers to identify competencies, it may be best for SDA staff or task forces to do the work of refining the competencies to eliminate redundancies, and to make sure that each competency includes a clear indicator and benchmark.

In some service delivery areas, there may be employers who want to play a strong role in this refinement process. Also, the role of the PIC may vary from substantial involvement to advice and oversight, in addition to the mandated role of approving competencies.

Getting Started

A number of resources may exist in your area to help you with the task of refining your competency list and developing indicators and benchmarks. Listed below are some of the ways practitioners have approached the task:

1. As mentioned above, a task force of SDA staff could take on the job. The task force should be carefully selected in order to include people who have a good knowledge of the community, because there will be many occasions when special expertise will be needed. The local or state vocational education system will likely be a valuable resource.

2. A task force with wider membership, including people outside the actual service delivery agency, could also be appointed. Such a task force could be appointed by a PIC or a subgroup of the PIC.

3. Consultants and others in the community with special expertise in competency-based approaches to skill development could be retained for the task of developing indicators and benchmarks.

Regardless of the specific methodology you choose, the following suggested activities may be appropriate.

SUGGESTIONS FOR SUCCESSFUL COMPETENCY DEVELOPMENT

1. Remember to include assessment in the process of developing indicators and benchmarks. Task forces should include those familiar with assessment procedures and instruments. Consultants should thoroughly understand the role of assessment as well. It is a great time saver, and it will

contribute to the overall efficiency of your program if, while you are developing indicators, you ask, "How will this indicator be measured?"

2. Review the results of the survey of employers (assuming that one has been carried out). These survey results may contain some good ideas about what employers regard as acceptable indicators and levels of proficiency for the local community. Any information those employers provided regarding entry-level hiring requirements will be useful.

3. Develop each competency separately, making sure it reflects practices and requirements operating in the community.

As an example, most employers in one area might hire beginning typists only if they can type 55 wpm or more. You might build competency statements with this information as follows:

COMPETENCY AREA	JOB SPECIFIC SKILLS
COMPETENCY	PARTICIPANTS WILL DEMONSTRATE ACCEPTABLE OFFICE SKILLS
COMPETENCY INDICATOR	BY TYPING
BENCHMARK	55 WORDS PER MINUTE ON A STANDARD TYPING TEST

You may wish to examine the "Starter list" of competencies at the end of the previous section to get practice in thinking about appropriate indicators and benchmarks and to make some preliminary decisions about their relevance for your community.

4. Check to see whether your competency list, including benchmarks and indicators, accurately reflects requirements and practices in your community. You may want to circulate a draft among employers, and/or you may need to get PIC input before you present the final version to the PIC for approval. Some suggested criteria, developed from the experiences of other practitioners, appear below:

Criteria for Competencies

1. Comprehensiveness: Does the set of competencies include all of the general behaviors that youth need for entry into the

work force (or enrollment for further education or enlistment in the military)?

2. Manageability: can youth realistically attain the competencies, and can the competencies be attained with available resources?

3. Importance: does each competency that is included describe an important skill, knowledge, or attitude related to the goal of the program?

4. Clarity: is the general behavior described clearly? Will people understand what is meant by the competency? Will different people understand it in a consistent way?

5. Freedom from Stereotyping: is the competency free of wording suggesting that some social, occupational, or life roles should be valued more than others? Is the competency applicable across lines of sex, socio-economic status, race, rural and urban settings, and religious persuasions in your community?

Criteria for Indicators

1. Comprehensiveness: do indicators provide a range of skills, attitudes, knowledge, and behaviors youth can use to demonstrate competencies? Can youth demonstrate a competency in more than one way?

2. Manageability: can the indicators be demonstrated using current resources?

3. Importance: is each indicator important? Does each indicator describe a skill, attitude, knowledge, or behavior that is critical for success in the world of work?

4. Clarity: is each indicator clearly stated so that youth, employers, and others will know what skill, knowledge, attitude, or behavior is being described?

5. Freedom from Stereotyping: is each indicator free of wording suggesting sexual, racial, or socio-economic stereotypes?

6. Measurability: is it possible to set a benchmark on the indicator; can an assessment approach and measurement device be found or developed?

Criteria for Benchmarks

1. Is the standard of performance that is expected clear and unambiguous?
2. Is each benchmark acceptable to employers?
3. Does each benchmark set a level of performance that is attainable by participants?
4. Can the achievement of each benchmark be measured?
5. Does the program provide a real opportunity for participants to attain benchmarks?

Questions and Issues

Numerous questions will arise in the process of developing competency statements to which neither the JTPA legislation nor accompanying regulations directly speak. These omissions are purposeful, however, for they represent areas in which it is the responsibility of the local jurisdiction to set standards. Some of the questions are these:

1. How many competencies should be in each competency area?

NUMBER OF COMPETENCIES

There is, of course, no absolute number. The number of competencies depends on the skills that are needed for entry level employment in your community. The list should be workable; probably not every single competency needs to be listed--no more than the employer would require for the perfect employee--but the most important competencies should be included.

2. Does each youth have to complete each competency?

ATTAINMENT OF COMPETENCIES

In general, the intent of the program is for youth to develop the competencies needed for entry into the work force, continuing education or training, or enlistment in the military. It should be emphasized that while participants ought to exhibit competence in each area, some participants will enter the program having already attained some of the required competencies. Programs should only seek to remedy demonstrable deficits in competence.

3. Different employers seem to have different requirements for their employees. How do you determine what is acceptable?

STANDARDS

In most cases it will not be difficult to generate consensus around acceptable benchmarks. The key point here is to get information from employers that will allow you to develop a program that meets employer needs, so that when youth seek a job, they will be able to say, "See, I can demonstrate the skills you yourself have said are important."

4. This seems to be a paper-oriented process. Is there some way to keep the paper blizzard manageable?

RECORD-KEEPING

Competency-based employment and training need not be overly paper-oriented at all. Careful development of only those forms that are needed, carefully refined competency lists that reflect critical competencies, and use of technologies such as microcomputers can all keep paperwork at a manageable level.

5. How does one deal with the situation in which the employment picture is constantly changing? Do you still use the same competencies and benchmarks?

THE CHANGING LABOR MARKET

Part of the plan for developing competencies should include a process for revision and updating. Conditions may change in a given community, and you may find for unexpected reasons that a certain competency is not important, or that it is too expensive to deal with.

Summary

This section has presented suggestions for refining a competency list into a manageable form that can be used in your program.

The next section discusses assessment, which should be under consideration during the process of setting indicators and benchmarks.

C. Assessment and Measurement of Competencies

Overview

Competency-based employment and training offers an opportunity to integrate assessment and measurement into other program activities in a way that can almost completely eliminate traditional concerns with the assessment process.

PLAN EARLY FOR ASSESSMENT

One key to using assessment successfully is to plan for it early. As the previous section suggested, planning for assessment should begin at the time competency indicators and benchmarks are developed. The question "How should this competency be measured?" should be asked at that time, and if there is no way of measuring the competency, then it should be discarded from your program.

This section is intended to provide an overview of the chief issues involved in weaving assessment into competency-based employment and training programs for youth. Many questions of technical interest are barely touched on here, although the resources listed at the end of this Guide include references for those who would like to pursue these questions further.

Introduction to Assessment in Competency-Based Employment and Training

FUNCTION OF ASSESSMENT

In the past, one of the chief problems with assessment was that there was only a loose connection between assessment activities and skills that a youth attained as a result of his or her participation in an employment and training program. Moreover, some practitioners were frustrated by the enormous numbers of tests and measurement instruments, and others were impatient with the time it took to carry out many kinds of assessment.

Nearly all these problems can be circumvented, or at least diminished, by understanding the function of assessment in a competency-based employment and training program, which is to determine a program participant's need or readiness for further training or employment experiences.

ASSESSMENT PROVIDES DATA FOR DECISIONS ABOUT PARTICIPANTS

Assessment and testing are not done simply for their own sake, but instead every assessment activity is undertaken to help reach a decision about the participant: has the participant achieved a ninth-grade reading level? Is the participant ready for an unsubsidized employment? What is the appropriate assignment for the participant in our program?

If it is not clear what decision is being made, then assessment should probably not be done. In assessment, as in any other information-gathering activity, two cardinal rules are:

- Specify a purpose for each item of information to be gathered.
- Do not gather any information for which you have no purpose.

In the figure below, some samples are shown which specify measures (and indicators) as they might be tied with certain competencies. Note that both locally developed measures (an employer rating form) and standardized measures are used (the Pre-employment Knowledge Questionnaire). Also, previously generated documentation (a letter from a previous employer) is also used. Indicators are also provided--within JTPA such indicators are always generated locally.

Competency & Indicator	Benchmark	Measure
Understands major conditions and factors influencing successful job experiences and increasing job effectiveness	32 of 43 correct responses	Pre-employment Knowledge Questionnaire
The participant will demonstrate the appropriate appearance on the job as determined by the worksite dress code.	Rating of satisfactory or above for 300 of 330 hours	Employer rating form OR letter from previous employer

Fig. 2: Sample Assessment Measures

SPP

LIMITATIONS OF ASSESSMENT

In thinking about assessment, it is important to keep in mind that no assessment instrument gives perfectly accurate information on the level and nature of an individual's competency. This is particularly true for individuals whose competency level is borderline. Whenever possible, assessment data should be supplemented with other kinds of available information, such as in-program behavior or performance.

Assessment is frequently carried out by means of various kinds of paper and pencil tests. However, there is no reason to assume that just because an assessment is being carried out, it must involve written testing.

In fact, there are good reasons to consider alternatives to standard paper and pencil assessment techniques:

- Most traditional paper and pencil tests are similar to classroom examinations, with which many participants may have had a history of failure.
- Many paper and pencil tests have written directions at an inappropriate reading level; if directions are not understood by persons taking the test, results are meaningless.
- Individual test items may reflect unfamiliar cultural content.
- Some participants may have inadequate experience with tests of any kind, and so do not have the "test wiseness" which can influence test results.
- Many published tests will not relate clearly to competencies around which you are designing your program.

Despite these limitations, some paper and pencil tests have considerable field research and program experience behind them. The choice between developing new systems or adapting existing ones should not be made without carefully surveying existing relevant materials.

Assessment Purposes

THREE PURPOSES FOR ASSESSMENT:

o INITIAL PLANNING
o MONITORING
● EXTERNAL REPORTING

In competency-based employment and training programs, assessment of competencies falls into one of three categories, each of which is intended to serve a different purpose.

1. Initial planning assessment is designed to help determine an incoming participant's level of competency so that appropriate services can be planned.

Characteristics:

- identifies participant's deficiencies in competency areas
- used by program administrators
- covers competency areas or broad competencies and assists in making decisions about placement
- varies depending on characteristics of the available program options--choice of initial assessment measures should be matched to available program options

2. Assessment for monitoring ongoing competency attainment is used to track the competencies participants are attaining, and to adjust services so that they continue to be targeted on participants' competency needs. This activity insures that assessment is tied to services and does not become merely a "testing burden" for participants.

Characteristics:

- used by instructors/trainers to make decisions about the next activity needed
- focuses on competencies at a detailed level

3. Assessment for external reporting may be used a) to make decisions about the readiness of a participant for a given job (this use of assessment is closely related to certification); and b) to make programmatic decisions.

Characteristics:

- used by employers or their representatives to determine whether a person is qualified for a job
- must be clearly tied to relevant job tasks

- needs to be well-developed in a technical sense since the consequences of the decision (whether to offer the person a job) are extremely serious

It is critical to know the purpose of an assessment before the assessment is done, since the procedures and instruments are likely to vary depending on which kind of purpose is involved.

Instruments used for initial assessments usually need to cover several competencies with little detailed information being provided on each. For example, a general reading test may be sufficient to tell a counselor that the participant does or does not need help with reading skills. The counselor may not need detailed information on specific reading skills (e.g., identifying main ideas, drawing inferences, vocabulary). However, the reading instructor may indeed need a test which gives information about the participant's ability to identify main ideas and so forth.

Assessment for external reporting needs to be clearly oriented toward the decision to be made. For instance an employer considering a specific candidate for a job may need more specific information about the candidate's reading level than that provided by a standardized reading test. The employer may need to know whether the candidate can perform reading tasks required by the specific job, for example the ability to read technical instructions related to the operation of a machine. A standardized reading test may not be appropriate for assessing this level of reading, and another assessment instrument may need to be located. In fact, however, most employers will be more interested in the simple certification of competencies, rather than in actual test scores.

Assessment Methods

A number of assessment approaches are available, but there are only a few essential differences among them. The differences concern the three basic components of any assessment:

- stimulus
- response
- scoring method

In all assessment methods, some stimulus is given to the person being assessed (e.g., a written or spoken question or instruction) which requires some kind of response (such as writing an answer to a question, or carrying out an instruction), which is scored or rated according to some kind of established criteria (for example, answers on a written test are compared with previously established correct answers, or in the case of a mock job interview, the participant's actions may be compared with a list of desirable actions).

BASIC METHODS OF ASSESSMENT:

- OBSERVATION OF BEHAVIOR
- PRODUCT REVIEW
- ORAL OR WRITTEN QUESTIONS

The three basic methods of assessment--behavioral observation, product review, and oral or written questions--all include (or should include) the three basic components (stimulus, response, and a scoring method). These three methods are explained in detail below. Which method you choose depends on two fundamental factors: a) the nature of the competency being addressed (whether it is a skill, knowledge, or attitude); and b) whether the competency involves a process people use or a product they produce. The discussion below highlights these factors.

Method	Sample Application
Behavioral Observation	Counselor develops mock interview format to use with participant. Standardized checklist used to test correct operation of a machine.
Product Review	Examination of a product developed using a work sample system such as the Singer Vocational Evaluation System Evaluation of a writing sample using explicit criteria developed by instructor.
Questioning	Standardized paper and pencil test (e.g, Program for Assessing Youth Employability Skills [PAYES] or the General Aptitude Test Battery [GATB]. Self-developed tests (oral or written) designed to measure various competencies.

Fig. 3: Sample Applications of Assessment Methods

Behavioral Observations

Whether a competency focuses on the application of a skill, knowledge, or attitude, the most appropriate type of assessment is frequently behavioral observation. This is particularly true if the competency relates to a "process" outcome. For example, many speaking and listening skills can only be assessed accurately by observing a person in a situation requiring demonstration of the skill. Asking people if they listen carefully is obviously a less accurate measure of their listening skills than observing them in a situation requiring listening.

Two general situations for behavioral observation exist: actual and simulated situations. Certain competencies (e.g., punctuality) can best be observed in actual situations. Was the participant punctual in actual work experience situations? In actual program situations? Others, such as interviewing, can be observed in a simulated situation. The major advantage of actual observation is that it has greater fidelity to real life. Its major disadvantage is that it does not allow the amount of control of the situation that may be necessary to assess competencies accurately. Simulated situations offer just the opposite major advantages and disadvantages. They are not as true to real life, but they allow greater control of the situation, thus improving the assessment's accuracy. Both actual and simulated situations have the disadvantage of usually being comparatively expensive to develop and time consuming to conduct.

Checklists and Rating Scales

Checklists and rating scales can be used for behavioral observation and product review assessments. They may be especially useful in assessing pre-employment and work maturity competencies.

Product Review

In many cases, the presence of skills can only be demonstrated by having the person produce a product, such as writing a report, reassembling a carburetor, or building a bookshelf. The assessment then entails use of a rating form or checklist to determine the quality of the product.

While a paper and pencil test may show whether a person has prerequisite knowledge, the product review shows whether the person can actually produce the product. For example, someone may show knowledge of correct spelling, punctuation, and structure via a multiple choice test. But not until the person actually writes (for example) a report which is reviewed against established criteria do we have confidence that he or she has adequate writing skills for a given job.

The chief disadvantage of the product review method is that many products are time consuming or expensive to produce. Also, many important competencies do not lend themselves to this approach.

Oral and Written Questions

The two basic types of oral and written question formats are (1) open-ended questions in which the respondent generates an original answer and (2) multiple choice questions in which the respondent selects from among two or more possible answers. When the person being assessed has limited reading skills (and when reading is not the skill being measured) questions can usually be given and answered orally.

Oral and written questions are best used for assessing whether people have acquired knowledge or can apply knowledge by mentally solving a problem. Questions can also be used to give an indication of attitudes and interests, but such assessment results must be very carefully interpreted. Attitudes and interests can fluctuate markedly from day to day or situation to situation. And written or oral questions of attitude and interest are not always accurately answered because people tend to "second guess" in the search for socially acceptable answers.

Open-ended and Multiple Choice Questions

Open-ended and multiple choice questions may be given either orally or in writing. The choice between oral and written forms depends on the skills or knowledge to be assessed and on the oral or written skills of the respondent.

DEVELOPING INSTRUMENTS IN-HOUSE VS. PURCHASING AVAILABLE ONES

Most Service Delivery Areas will not have the time or resources available to develop their own assessment tools to any great extent. SDAs will need to depend on existing assessment instruments, the advantages being that such instruments are inexpensive (compared with the costs of developing one's own) and may be of high technical quality. Persons considering the use of published tests, however, should be aware that those tests may not have all the characteristics important for their particular situation. For that reason, instruments must be carefully reviewed to make sure that they will provide useful results.

CRITERIA FOR CHOOSING ASSESSMENT INSTRUMENTS

Three general categories of criteria should be used in reviewing assessment instruments: validity, usefulness, and reliability.

Validity refers to the extent to which the instrument measures the skills, knowledge, or attitudes the user intends it to measure. This is the most crucial issue in selecting an instrument. Just because the title says that an instrument measures job knowledge or reading skills does not mean it measures the ones that are important to you or are relevant to your community. Each question in the instrument should be looked at with a critical eye to determine if a person's answer to that question is truly going to help decide if the person has achieved a competency and benchmark used in your program. For example, if an instrument measures knowledge about jobs that are unavailable in your area, that will clearly not be useful to you. You may need to use the format and type of questions as a model for developing your own instrument.

Questions to ask:

1. Do the questions measure the specific competencies that need to be assessed?

2. Were the questions developed in a systematic and rigorous manner so that content is adequate and bias minimized? (Instruments may come with a manual answering this and other questions.)

3. Were scientific procedures used to screen or select items to ensure that they measure what they were designed to measure? Are the questions understandable and free of ambiguous alternative answers and too complex language?

4. Was the instrument validated using a group representative of the population with which the instrument is going to be used?

Usefulness of an instrument refers to the extent to which the instrument is suitable for the context in which it will be used. One of the most frequent reasons instruments are not found useable is that the level of reading they assume is different from that of the persons being assessed. In other cases, the method of scoring may be cumbersome, may require special equipment, or it may take longer to get results than program time constraints allow.

Questions to ask:

1. Are the questions at a suitable language level for your program participants?

2. Are instructions to the person administering the instrument clear and complete?

3. Are instructions to the respondent clear and understandable?

4. Is the instrument clearly formatted?

5. Is there a simple way for respondents to record their responses?

6. Does the instrument yield scores that are easily intepreted and appropriate for their intended use?

Reliability refers to the extent to which an instrument measures a trait consistently. Mathematical formulas exist for calculating the reliability of multiple choice instruments. In reality, no instrument is perfectly reliable, but acceptable levels are in the .70-.98 range (on a scale of 0 to 1.00). Good tests of knowledge will achieve reliabilities in the .70-.90 range. Attitudes are by their very nature less stable than "knowledge," and so their measures are less reliable.

With instruments requiring human judgment in the scoring (for instance rating forms or open-ended questions), an important form of reliability is the consistency among raters. This type of reliability must be determined locally by having two or more raters conduct a rating and then comparing the similarity of their ratings. For help with the ways to check interrater reliability, you may want to consult an educational measurement textbook, program evaluator, research specialist, or a local college or university measurement specialist.

Questions to ask:

1. Is reported reliability for scores sufficiently high? (Consult technical manual accompanying the instrument.)

2. Are the scoring procedures clear and complete, thus ensuring reliable scores?

Examples of Published Instruments

A wide array of published instruments are summarized in the Appendix.

Common Questions about Assessment

1. Should we set up a centralized assessment system?

JTPA does not specifically address the issue of whether SDAs need to establish centralized assessment. An assessment center, however, does seem to be a logical extension of the idea that competencies are to be developed for use throughout a service delivery area. Indeed, many practitioners would encourage using centralized assessment.

2. Does assessment mean that our SDA needs to do all of it in house? Does it mean we need to either purchase existing instruments or develop our own?

The answer to both questions is, "No." SDAs should use the results of existing assessments (such as those done in schools) wherever possible to minimize duplication and save time. Of course existing assessments should only be used when they relate directly to a competency that is part of your program. Persons from agencies which normally perform assessments should be involved in the process of planning and developing your competency-based program.

3. How many times should assessment be done? Is there a danger of doing too much assessing?

The answer to this question will vary from SDA to SDA; however, in most cases assessment will be done on initial intake in order to determine goals and appropriate placement for the participant. This is the "Initial Planning" type of assessment discussed above. Then ongoing assessment needs to be done to determine whether and when competencies are being attained. Ideally a youth should have an opportunity to demonstrate a competency whenever he or she feels ready. Final assessment should be done when a youth has completed an activity--although again, ideally, an activity would not be completed until the young person had attained the competency the activity was designed to teach.

4. What about attitude measurement? Are there good instruments for measuring attitudes like "responsibility," "punctuality," and so on?

These attitudes can be measured--but paper and pencil tests are not the only way of doing so. You (and local employers) need to ask yourselves, "What does a responsible person do?" and then go on to ask, "How do we know when it is done?" You might answer, for example, "A responsible youth is one who asks a supervisor for help when it is needed." Then you might use employer reports as a source of information.

There may be many other questions you have at this time, and further technical assistance documents will likely be available to assist you.

Summary

Assessment is the means by which a program determines the initial skill level of participants in the three competency areas, and it is the way programs measure the attainment of competencies.

There is a mass of material and information on assessment, and staff can easily feel overwhelmed by the sheer amount. Locating and using only those instruments which relate to competencies of your program may save a lot of time in the long run; developing your own rating scales and observation checklists may be the key to custom-designing an assessment strategy that is truly useful. To decide which option is best requires a review of available materials and a determination of whether or not your SDA has the resources, time, and capacity to develop its own assessment instruments.

D. Focusing Program Opportunities on Competency Attainment: Individualized Planning for Employment Skills

Overview

Thus far, this Guide has discussed setting competencies, developing indicators and benchmarks that reflect competency attainment, and methods of assessment. In this section, processes will be discussed for using program opportunities--the mix of services available to young people--to foster the attainment of competencies.

The key to focusing program opportunities on individual competency needs is the concept of individualized planning for service delivery.

This is not a new concept: the matching of individual needs with training strategies has been the basis of the apprenticeship approach to skills acquisition for decades. In apprenticeship, an evaluation is made of the applicant's entering level of achievement; a curriculum of on-the-job training and related instruction is negotiated between trainer and trainee; individual achievement goals are spelled out and periodic judgments are made about the progress of the individual apprentice.

The individualized approach to service delivery in education, training, and employment was also adopted in legislation establishing the Job Corps in the early 1960s; today, mandates for written, individualized plans exist in the Work Incentive (WIN) program, the Vocational Rehabilitation Act, the Comprehensive Employment and Training Act (CETA) and the JTPA which replaces CETA, and the Education for All Handicapped Children Act, among others.

Elements of Individualized Planning

There are a number of models for individualized planning which have been developed. All of the models include these elements:

- a statement of the individual's need
- a statement of one or more goals toward which the individual is working

- a statement of services which will be provided
- a description of the method which will be used to determine whether the goal has been met.

The process of individualized planning implied by these models may be visualized as follows:

Initial Client Identification

Assessment of Client Needs

Development of the Service Plan

Allocation of Resources and Placement in Services

Delivery of Services

Periodic Evaluation of Client Progress

Fig. 4: The Planning Process for Individualized Service Delivery

For the planning phase, the match between needed and available services is considered. This phase may involve the youth, his or her parent(s) or guardian(s), and representatives of current and potential service deliverers. Goals are established for the youth, decisions are made regarding which services will be delivered, by whom, and how results will be evaluated and recognized. If necessary, interagency agreements may have to be arranged. This results in the development of the individual plan, followed by the specification of instructional and service delivery techniques and approaches. These steps may be carried out in either a very formal or an informal way, depending upon the circumstances. They can occur quickly, or over a longer period of time with the involvement of many agencies.

The outcome of the planning phase is the "road map" for the implementation of each individual's unique education and training program. Implementation involves actual delivery of the services. Because goals are clearly stated, and means of evaluation or assessment are clearly spelled out, the individualized plan is the standard against which a youth's progress is measured. Based on the results, the services being provided may be modified or adjusted to focus on the attainment of new competencies.

Contents of Individualized Plans

A number of early experiments within the CETA system featured individualized planning for youth. Perhaps the most important to consider for present purposes was the "Employability Plan and Record" (EPR) which was a mandated requirement of the Consolidated Youth Employment Program (CYEP). In most cases the EPR was a bulky document, and the processes necessary to use it were cumbersome. Nevertheless experience with the EPR taught important lessons about how to carry out comprehensive individualized planning.

An individualized planning process will normally include the following:

RECORD INITIAL ASSESSMENT RESULTS

1. a procedure for recording results of initial assessment of the participant's competency levels

DEVELOP GOAL(S) WITH
PARTICIPANT
↓
AGREE ON STEPS TO
REACH GOAL(S)
↓
AGREE ON METHOD OF
GOAL-ATTAINMENT

2. a statement of a goal or objective towards which the participant is going to be working during participation in the program (this may be stated in terms of the competencies of your program)

3. a "prescription" describing activities which will be undertaken to bring the participant to the desired goal or competency level

4. a description of the method by means of which the attainment of the goal or competency level will be measured; this description should make clear how and when assessment will take place.

Clearly, much more information could be added to an individualized plan. The list below presents some options which you may want to consider as you go about planning:

1. Participant goals for competency development could contain statements of both long and short range goals.

2. Information about the young person's educational and work history could be included.

3. Special information relating to individual needs could be included.

4. Other data related to intake and eligibility could be included.

5. Records of activities completed and competencies attained could also be included.

In spite of the fact, however, that it may seem attractive to develop a truly comprehensive form, it is probably best to develop the simplest kind of form that still meets individual and program needs.

The sample on the next page may provide ideas to aid your planning.

SAMPLE INDIVIDUALIZED PLANNING FORM

Name of Participant________________________

I. Previous Work History

II. Educational Background

III. Other Skills, Attainments

IV. Asessment Results

- Pre-employment and Work Maturity
- Basic Educational Skills Competencies
- Job Specific Skills Competencies

V. Goal(s) for Competency Attainment

VI. Services to Be Provided

- Description of Service
- Duration

VII. Method of Assessment

Fig. 5: Sample Form for Individualized Planning

Naturally, the individual requirements of each SDA will result in agreements that may look quite different from the one presented above. Nevertheless, in order to function effectively within a competency-based employment and training program, the elements included above should be evident.

Advantages for the Service Delivery System

INDIVIDUALIZED
PLANNING CAN YIELD
ORGANIZED INFORMATION
FOR THE SDA

In addition to being viewed at the level of the individual, the figure above can also be viewed at the level of the service delivery system--the "macro" level. What is striking at this level is the utility of individualized service delivery as a tool for organizing information for decision-making regarding resource allocation, i.e., for designing an integrated and comprehensive delivery system.

The information which can be gathered, for example, from the client identification and assessment stages of individual plan development yields a picture of who is receiving services, where the services are being received, and the needs that these persons have. This data can be analyzed against aggregate statistical data on demographics and needs to see if services are appropriately targeted, or if there exists a significant incidence of underservice to any particular client group or any particular geographic area.

The development of individual service plans based on assessment of client needs forces one to look around the community to identify what services are available and which agencies deliver them. Such an exercise is a good way to identify gaps (and duplication) in the continuum of services.

Measuring the progress of individual clients against goals set for them can give an SDA a firm basis for evaluating the adequacy, quality, and effect of various programs. It also helps determine what works best under differing conditions, thus minimizing the possibility of inappropriate placements and wasted resources.

Suggested Activities

SDA staff faced with limited resources may well fear that individualized planning will be too time-consuming, too expensive, and that the paperwork will be overwhelming. These dangers are real if the process is not carefully implemented. The following strategies are aimed at cutting down on planning time, reducing the burden of paperwork, and making more efficient use of resources.

1. Build staff awareness of individualized planning

The concept should be an integral part of the competency-based employment and training strategy. The relationship of assessment to individualized planning should be clear, and the relationship of plans to services and ongoing assessment is a fundamental concept for which staff charged with carrying out the program need "buy-in."

2. Develop functional forms for use in your program.

- A format should be designed that takes into account the ways in which assessment data are reported for participants in your program.
- The format should be designed so as to collect information that can eventually be used to develop a "profile" or transcript of the skills, knowledge, and experiences the participant gained as a result of participation in the program. Employers find these credentials quite useful.
- The format should enable easy collection of information that will be necessary for program planning and evaluation activities.
- You may be able to design forms that will provide periodic caseload management signals indicating the need for progress monitoring and program updating activities. This has been designed into the Job Corps computer management system for Employability Development Plans (EDPs).
- Specific provisions for evaluation should be built into the individualized plan. This helps the participant know both what is being expected of him/her, and how to demonstrate those expectations.

3. Consider the use of electronic data processing.

The tasks of storing, retrieving, and updating individual planning documents, and the tasks of gathering, aggregating, and reporting data from a collection of documents are all time-consuming. It is possible to use computers to collect and maintain longitudinal information on an individual's competency development plan, to reduce the amount of time required to complete and maintain program information, to assist in the development of extensive and complicated reports and to carry out applied research. As the costs of computer hardware continues to fall and the quality and availability of computer software increases, computers become an increasingly attractive option for service delivery agents. While the scope of this document does not permit a lengthy investigation of the pros and cons of computer use, it should be pointed out that individualized planning can fit well with SDAs' plans for acquiring and using computers.

Summary

A competency-based employment and training system implies individualized planning to the extent that each individual will have a unique set of competency needs. Use of a careful planning process provides help to the participant by making goals, activities, and assessment explicit; at the same time, the SDA benefits from individualizing planning as well. Data can readily be gathered on numerous aspects of program operation using aggregated information from individualized plans. With this data, program activities can be modified, improvements can be made, and information about the program can be disseminated to a variety of audiences.

The next section will investigate how individualized plans may form the basis for certifying the accomplishments of program participants.

E. Recording Ongoing Competency Attainment

CERTIFICATION; A KEY CONCEPT IN EMPLOYABILITY DEVELOPMENT

Although programs for training and skill development exist at many levels--the classroom, apprenticeship programs, employee upgrade training, vocational education, the military service, to name only the most obvious--many young people still suffer significant problems in entering the work force. They do not complete high school and they do not gain adequate skills or credentials from the programs that are offered. While many youth may gain work experience while still in school, other youth do not have the opportunity either to work or to go to school. As a result, too many young people appear at a potential employer's doorstep lacking personal credibility, uncertified, ill-prepared to meet the increasingly high skill demands of the economy, and seemingly a poor risk as a new hire.

FORMAL ACTIVITIES
INFORMAL EXPERIENCES
TRADITIONAL PROGRAMS
NON-TRADITIONAL PROGRAMS

↓

CERTIFIABLE SKILLS

Within the competency-based approach that is a part of the Job Training Partnership Act (JTPA), the opportunity exists for youth to develop a simple, useful credential which can be presented to employers and others needing to know the competency level of a young person. Such a credential can be used to certify the possession of competencies which may have been acquired in a variety of ways, both formal and informal. Competencies which may have been gained through participation in traditional and non-traditional programs may be summarized in a credential that provides a measure of standardization for what may have been an extremely diverse set of experiences.

Indeed, young people who have become disillusioned with traditional educational offerings may have acquired their competence in a great variety of ways. Regardless of how a skill has been obtained, competencies can be recognized and be made part of the youth's record if they can be demonstrated via the assessment process.

Even among youth who have been able to take advantage of available programs, the profusion of programs and program delivery systems, along with the lack of clearly articulated employability competencies, have made it difficult for employers to judge the quality of programs or more importantly, the skills of its graduates.

The problem has been especially severe in regard to employment and training programs which with few exceptions have had no systematic way of communicating either program goals or participants' actual learning outcomes to persons outside the system.

What has happened most frequently is that when credentials are required, the standards and methods of traditional educational accountability systems are used. Because these systems are applied to nontraditional programs, they usually discount the learning that takes place in nontraditional settings. Furthermore traditional education institutions and audiences cannot "recognize" the learning through provision of credit because it is not presented in a form and fashion that is consistent with their policies and procedures. As a result it is extremely difficult to make comparisons between persons coming out of alternative programs and graduates of more traditional programs.

In a competency-based system, programs are structured to meet the needs of the workplace, and consequently participants in such programs can easily be "marketed" in the workplace.

The process of monitoring competency attainment offers a valuable opportunity to provide a young person with both skills and the means of presenting those skills through some kind of permanent record.

COMPETENCY CERTIFICATE = GOALS ATTAINED WITH INDIVIDUALIZED PLAN

A certificate of competencies attained might be viewed as a streamlined version of an individualized planning form. It contains information that employers need to make decisions about hiring. An employer probably does not need to know the results of intake assessment or the results of specific progress assessments. However, the employer should be able to tell readily from the participant's credential what skills, knowledge, attitudes, and behavior he or she can demonstrate.

Certification also has the additional value of providing motivation for participants. A certificate can have the force of a "diploma," and it can be something that can have lasting value for the youth.

Suggested Activities

Experience of competency-based programs in education, the military, and employment and training programs shows that it is possible to develop an employability profile using information generated by assessment, training, and internal management activities that normally take place within the program. Methods for doing this are discussed below as options for how such profiles could be designed for competency-based youth employment and training programs. Any such profile shoud be based on the individual's record of performance within the program, documenting the progress made by the individual and the actual competencies or skills attained. Other kinds of information the document might contain are:

- instructor ratings
- work supervisor ratings
- documentation of work and training experiences
- certification of individual achievements in terms of competencies making up your program

Job Corps Model

Within the Job Corps, individualized competency-based program recordkeeping is accomplished through the Training Achievement Record (TAR). The TAR is the principal form used to evaluate and monitor the progress of individual corpsmembers in all Job Corps courses. At any time during a corpsmember's participation in the program, the TAR provides a summary record of the corpsmember's performance to date in terms of the competencies set forth in the course plan. Since each module in a course is built around a competency required for employment in an occupational cluster and/or a single occupation within that cluster, the corpsmember's achievement is recorded by competency module rather than by a single task or bits of knowledge. Furthermore, since corpsmember achievement is determined by entry-level industrial standards, as measured by criterion-referenced tests, achievement is recorded only when the corpsmember performs to industrial standards.

Since the TAR contains a complete training record of the corpsmember performance within Job Corps, it assists in job placement and the preparation of what is called an individual Corpsmember Employability Profile. This profile is a summary document which provides employers with a quick overview of the competencies attained by the corpsmember. The TAR forms are reproduced at the end of this section.

Experience-Based Career Education (EBCE)

Student records and credentials developed under this model, which blends academic experience with work experience, are an integral part of the program's recordkeeping system. The program documentation process includes a record of the student's performance, a portfolio of employer recommendations as well as an employer-verified record of student achievements in important life-role competencies such as establishing a banking account, preparing a letter of application for a job, etc. The EBCE forms are reproduced at the end of this section.

Career Passport Project

The Career Passport Project developed a generalizable process for reporting attainment of competencies gained by youth with a wide variety of backgrounds and experiences. The process of developing a career passport may be summarized as follows:

DESCRIPTION OF	work experiences hobbies inschool activities community activities volunteer activities home responsibilities
TRANSLATION INTO	skills knowledge attitudes competencies interests
PRESENTATION	in a career passport or experience report
USED FOR	interviews job applications self-awareness counseling

A sample career passport is presented on the next page.

CAREER PASSPORT (Sample)

Name: John Doe Date of Birth: July 4, 1963

City, State, Zip: San Jose, CA 97133
Telephone: 408/923-5928
Social Security Number: 274-06-4116

Career/Job Plans

LONG RANGE OBJECTIVE:

My goal is to become a painter in the construction industry.

SHORT RANGE OBJECTIVE:

I would like full time employment with apprenticeship training. I also desire to help support my family and to gain experience in the construction industry.

EDUCATIONAL PLANS

I would like to get my GED while completing my apprenticeship training.

Education/Training

I am not presently attending school. The name of my last school was Independence High School in San Jose, CA. My major course emphasis was general education.

Job Skills

I have the skills to work as a painter, janitor, and as a warehouse worker.

My three best vocational skills are working with people, working with my hands, and working with tools. I am also capable of instructing others.

Job Experience

My previous employment experience has been as a painter for ABC Paint Co. and as a janitor for Hewlett-Packard. I have also volunteered as a manager for a baseball team. My family responsibilities include helping my younger brothers and encouraging them to stay in school.

Special Strengths, Interests, and Abilities

My strong points are that I am a good listener, honest, and I can work with others. I am also bilingual (Spanish).

References

John Doe was a dependable, honest employee and demonstrated the ability to learn and to work with others.

John Brooks, President
ABC Paint Company

Fig. 6: Sample Passport from Career Passport Project

Summary

The credentialling process is the final step in a competency-based employment and training project, and it is the step that will be perhaps of the most practical value to the young participant. Its practicality is that certification of competencies gained will allow the youth to present evidence of accomplishment to employers, and to other educational or training institutions. With a credential certifying proficiency in skills, knowledge, attitudes and behaviors deemed by employers themselves to be necessary for employment, the youth is in effect saying, "I have the skills you need--and the documentation to prove it."

Job Corps Training Achievement Record (TAR)

NAME	SOCIAL SECURITY NO.	DATE TRA. TRAINING / ENTERED	TITLE Automotive Body Repairer DOT CODE ▶ 807.381	CERTIFIED BY

ACHIEVED INDIVIDUAL MARKETABLE SKILL		PERFORMANCE				KNOWLEDGE			
		1	2	3	4	a	b	c	d
Safety									
1. Practice safety on the job	4d								
2. Remove combustible fluid or vapor from gas tanks and lines, brake reservoirs and lines before welding	4d								
3. Use protective goggles/clothing when welding, brazing and leading	4d								
4. Use protective masks when exposed to paint vapors or noxious fumes	4d								
5. Use appropriate safety techniques when using jacks, lifts, etc.	4d								
6. Use protective clothing/handling procedures when working with glass	4d								
General									
7. Maintain and use common hand special tools	3c								
8. Use and maintain body and frame alignment checking equipment	3c								
9. Use and maintain refinishing equipment	3c								
10. Know principles of auto body construction	3c								
11. Know properties and characteristics of automobile metals	2b								
Straightening and Repairing Body Parts									
12. Inspect body damage; determine method of repair	2b								
13. Remove and replace upholstery trim	2b								
14. Straighten deformed panels, doors and fenders	2b								
15. Shrink and stretch damaged metal areas	2b								
16. Bump out folds, dents and creases	2b								
17. Weld cracks, seams and body parts	2b								
18. Locate body irregularities by hand or light method	3c								
19. Fill depressed areas using lead, plastic and fiberglass	3c								
20. Smooth filled areas	3c								
21. Clean repaired surfaces for painting	3c								
Body and Frame Alignment, Assembly									
22. Remove and install panels, doors and fenders	3c								
23. Align body	3c								
24. Check frame alignment using frame bar	2b								
25. Adjust, align hinges, locks and other mating surfaces	3c								
26. Install weather stripping; replace chafing strips	3c								
Glass Installation									
27. Remove and replace molding, hardware, pads, upholstery, window operating equipment	3c								
28. Remove damaged glass	3c								
29. Straighten, repair and replace channels	3c								
30. Repair and replace window operating mechanisms	2b								
31. Grind, bevel and smooth glass edges	2b								
32. Install glass in channels and body	3c								

U.S. DEPARTMENT OF LABOR
Employment and Training Administration

TRAINING ACHIEVEMENT RECORD

ETA 6-134 (May 1977)

ACHIEVED INDIVIDUAL MARKETABLE SKILL		PERFORMANCE				KNOWLEDGE			
		1	2	3	4	a	b	c	d
Glass Installations (Continued)									
35. Mask sections	3e								
36. Apply primers	3e								
37. Featheredge and sand surface	3e								
38. Use water orbital sander	3e								
39. Mix and prepare paint using thinners, dryers, retarders and accelerators	3e								
40. Paint prepared surfaces	3e								
41. Use and care of spray booths	3e								
42. Flash newly painted surfaces	3e								
43. Touch up after painting	3e								
44. Apply corrosion control materials	3e								
Additional Related Training Elements									

EDUCATION, TECHNICAL KNOWLEDGE–JOB PHYSICAL PROFILE		PERFORMANCE				KNOWLEDGE			
		1	2	3	4	a	b	c	d
1. Carry out instructions furnished in written, oral or diagrammatic form	4c								
2. Deal with problems defining numerous specific tasks of standard practices	4c								
3. Make arithmetic calculations with fractions, decimals, percentages	4c								
4. Read manuals and write reports, using proper sentence structure	4c								
1. Able to lift 50 lbs. maximum; carry to 25 lbs.; walk and stand continuously	4								
2. Able to use back muscles and legs to stoop, kneel, crouch, crawl	4								
3. Able to use fingers, hands and arms to reach, handle, feel	4								
4. Able to see efficiently	4								
5. Work indoors	4								

ATTITUDES AND PROFESSIONAL ETHICS		ATTITUDES & ETHICS				
		I	II	III	IV	V
1. Demonstrate correct safety practices on the job	V					
2. Maintain appropriate personal hygiene and appearance	III					
3. Arrive on the job on time	IV					
4. Is on the job every day	IV					
5. Perform work of consistently good quality	IV					
6. Function cooperatively with fellow workers	III					
7. Treat others courteously	III					
8. Work with even temperament	III					
9. Accept constructive criticism	IV					
10. Follow instructions willingly	IV					
11. Deal well with supervision	IV					
12. Willingly work unusual schedules when required	III					
13. Handle proprietary information discreetly; respect confidences	III					
14. Respect worth of equipment, company and personal property	IV					

[illegible]

Experience-Based Career Education (EBCE)

SKILL DEVELOPMENT RECORD

Student ______________________________ Site ______________________________

DIRECTIONS:

1. Ask your EI to take a few minutes to discuss with you the skills you will be acquiring at the site. List them here and note target dates for completion.
2. Ask your EI how well you should be able to do each task. For example:
   - A. Number of units per (hours, day, minute)
   - B. Percent of accuracy required
   - C. Able to initiate and complete without supervision
3. Have your EI note the extent of your participation:
   - A. You have observed the task
   - B. You have practiced the task
   - C. You have acquired the task
4. When you think you can do a task as well as your EI says you should, have him/her check you on the task and fill in the last two columns.

TASKS/SKILLS	EXTENT OF PARTICIPATION	TARGET DATE	COMPLETED	EI INITIAL

Skill Development Record, Side Two

TASKS/SKILLS	EXTENT OF PARTICIPATION	TARGET DATE	COMPLETED	EI INITIAL

STUDENT EBCE PERFORMANCE RECORD FOR USE WITH OTHER INSTITUTIONS

Student ______________________ Date ____________

Employer Instructor ______________________

Site ______________________

Learning Level ☐ Skill Building Level ☐

	Needs to Improve	Improving	Satisfactory	Commendable	Excellent	Does Not Apply
ATTENDANCE/PUNCTUALITY						
Reports to employer site on time						
Adheres to established schedule						

Comment:

ATTITUDE						
Understands and accepts responsibility						
Observes employer's rules						
Shows interest and enthusiasm						
Courteous, cooperative						
Good team worker						
Judgment						
Poise, self-confidence						
Demonstrates appropriate dress/grooming						
Concerned for equipment/property						

Comment:

LEARNING PROCESS						
Uses initiative, seeks opportunities to learn						
Learning growth						
Quality of assigned projects						
Asks questions of appropriate person						
Uses employer site learning resources						

Comment:

PERFORMANCE						
Begins assigned tasks promptly						
Seeks feedback concerning performance						
Accepts feedback information						
Uses criticism constructively						
Completes tasks assigned						
Progressively requires less supervision						

Comment:

ADDITIONAL COMMENTS:

____
Signed

STUDENT PROFILE

Student ______________________________

CAREER ASSESSMENT: Employer Relations Specialist
Date ____________________
Interest Tests:

BASIC SKILLS ASSESSMENT: Student Coordinator
Date ____________________
Test Results and Interpretation:

LIFE SKILLS/LEARNING STYLE ASSESSMENT: Learning Manager/Student
Date ____________________
Interview and Comments:

PART III: IMPLEMENTATION ISSUES

IN PART III, QUESTIONS ABOUT ACTUAL IMPLEMENTATION ARE FACED; ISSUES OF TIMING, RESOURCES, SCOPE, DESIGN, IMPACT, AND STAFF TRAINING ARE DISCUSSED

The purpose of this section is to provide guidance to SDA program planners and operators around key implementation questions that they are likely to face. It should be stressed from the outset that not all important questions will have easy answers--in spite of the fact that research and the experiences of practitioners point to the value of competency-based employment and training for youth, there is still much left to learn concerning how best to put specific programs into practice.

Also, there has been a consistent assumption in JTPA that the best programs are ones in which key decisions are made at the local level. As a result, guidance and directives from the federal level will be kept to a minimum. This Guide is written with the goal of encouraging the establishment of local level partnerships needed to answer key questions relating to program structure and implementation. While the examples and suggestions in the Guide have been chosen to reflect what has worked in certain specific situations, the authors realize fully that these examples will not necessarily work in every situation.

Most people with experience in competency-based systems agree that the most important implementation issues are the following:

- timing
- resources
- scope
- design
- impact on other operational systems
- staff training and capacity

Each of these issues is discussed further below:

Timing

Prime sponsors involved with the CYEP demonstration agreed that as much as two years may be needed for fully implementing a benchmarking system. The Department of Labor's approach on the use of competency standards is based on this need for longer term development The initial nine-month period should concentrate on the development of systems, policies, and procedures. The first full program year should then focus on implementation and refinement of the system. The question of timing is also, of course, linked to the complexity of the competency-based system being implemented. Simple designs obviously take less time and often fewer resources to implement than more complex ones.

Resources

The amount of money that SDAs have to operate youth programs has an impact on the types of competency-based practices that they implement. While most people feel that implementation of a new operational system requires financial support over and above what is allocated for normal program operations, several factors combine to suggest that implementation is feasible under existing resources under JTPA. First, the phase-in approach requiring plans to be formulated during year 1 of JTPA has the effect of spreading developmental costs over time, thereby lessening the financial strain that would result from having to implement a new program in two or three months. Second, JTPA intends that implementation be truly a partnership of key agencies and institutions. By building partnerships, SDAs may be able to increase the effectiveness of their resources and thereby offset additional costs of implementing a competency-based system. Third, the best way to think about competency-based employment and training is not (for most SDAs) as a brand new system requiring redesign and retooling from the ground up (like a new automobile). It is much more practical to think of it as a modification and redirection of existing practices. As has been stressed earlier, many SDAs already have in place many of the elements of competency-based employment and training. In addition, other local or state agencies, such as the vocational education community, may have already gained experience in competency-based programming. And finally, technical assistance and training will make available resources that should eliminate the need for costly development efforts.

Scope

An issue program designers will need to face early has to do with the scope of their effort. They will need to decide whether to implement a complete competency-based system or to phase in the implementation. Good arguments can be found for either approach. In SDAs where elements of competency-based employment and training exist, it may be possible to develop a full set of competencies, benchmarks, and assessment mechanisms for each competency area. On the other hand, in new SDAs and in SDAs where the concepts of competency-based employment and training are not well understood by staff, a phased-in approach may be preferable. One means of phasing-in might be to develop competencies first in one competency area, to test and refine measurement tools, and then to add the competencies from the other two competency areas in a second round of planning. Another approach might be to develop a pilot set of competencies to gain familiarity with how the process might operate. Based on the pilot results, a full implementation could be developed.

Design

Issues of program design focus on: (1) the variations in the design of intake and assessment procedures; (2) employability development planning and recording; and (3) documentation and certification procedures, MIS procedures, etc.

1. Variations in Design of Intake and Assessment Procedures

Intake and assessment should be much easier to perform under a competency-based system, for the reason that nothing needs to be done unless it relates to competency attainment. As mentioned above, centralized assessment seems to be consistent with the "spirit" of competency-based employment and training, since the legislation requires the same competency set to be used throughout a service delivery area.

2. Employability Planning and Recording

Decisions about who carries out employability planning, and about how often records are updated are also an important part of program planning. As mentioned above, forms should be simple to use, and should lend themselves readily both to recording of initial assessment results and to planning for competency attainment.

3. MIS Procedures

Individualized employability planning records can furnish valuable information for management purposes.

Impact on Other Operational Systems

Competency-based employment and training implies that an SDA may develop and maintain several management and administrative systems:

1. An MIS that can collect data on competencies and produce usable reports;
2. A planning and evaluation capability that can determine what kinds of competency data can be used to evaluate program performance;
3. A service delivery/client flow system that is adjusted to accommodate various elements of the process;
4. Clearly defined staff roles and organizational responsibilities that identify the relationship of operations staff to MIS and planning in terms of monitoring the performance of the competency-based system.

Staff Training and Capacity

The successful introduction of a new management system (or modification of an existing one) should be accompanied by appropriate staff training and preparation. Training may be required both in areas requiring special expertise (e.g., assessment) and in areas of building staff morale and commitment to a new effort.

PART IV: CONCLUSION

This brief conclusion will attempt to summarize the key points of competency-based employment and training under JTPA in a "quick-reference" format.

1. Purpose

The purpose of competency-based employment and training is to help young people attain competencies recognized by the Private Industry Council as necessary for entering the work force in the local community or service delivery area.

2. Components

Competency-based employment and training is built around the following components:

ASSESSMENT of participant competency level;

INDIVIDUALIZED PLANNING for services to help participants attain acceptable competency levels;

REASSESSMENT to determine if competencies have been gained;

CERTIFICATION of competency attainment.

3. Competency Development Process

Under JTPA, it is assumed that standards for employment are unique to local areas, and that representatives of business and industry ought to have a key voice in determining what those standards are. Employment and training agencies can then develop programs that help youth attain the identified competencies. The fundamental mechanism for participation of representatives of business and industry is the PIC. The PIC has a legislative mandate to approve competencies developed for a Service Delivery Area. If the PIC is conscientious in approving competencies that accurately reflect local needs and practices, and if employment and training agencies can provide services that allow young people to attain competencies, then there will truly be a partnership that will be meaningful for youth.

4. Glossary of Key Terms as Related to Competency-Based Employment and Training

Assessment: A determination of the level of a young person's skill, knowledge, attitude, or behavior.

Benchmark: A standard of performance of level of proficiency accepted by employers as a minimum for entry level employment.

Certification: A document intended for public use that describes competencies which have been attained by program participants.

Indicator: An observable behavior that indicates possession of a competency.

Individualized Planning: A plan, based on identified needs, for providing service to meet an identified goal. Individualized planning should include a provision for assessment to determine whether the goal has been met.

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Ready to Work: Using Competencies, Standards, and Assessment to Meet Local Employer Needs. Draft prepared by Beverly L. Anderson, Robert E. Blum, Greg Druian, and Larry McClure, Northwest Regional Educational Laboratory, August, 1981.

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Appendix I: A Sample Competency-based System

The Comprehensive Education and Training Opportunities Program (CETOP)

Competency-based systems have been developed and used in the education, vocational education and adult education communities for a number of years. While there has been some effort in the research and development of these systems for youth employment and training programs, there have been, in fact, very few systems that had actually developed a comprehensive set of competencies and had delivered services organized around the attainment of these competencies. One such program was CETOP. It should be noted that the CETOP system is not necessarily directly applicable to the JTPA framework. It has been included here as a sample of a competency-based system and provides a concrete, applied example of many of the concepts described in the guide.

CETOP was a demonstration project designed to provide an array of employability development and educational services to eligible youth. It served both in-school and out-of-school youth, and operated until August, 1982. CETOP was built upon benchmarks, or learning objectives, which divided into three skills areas: life coping skills, work readiness skills, and basic academic skills. Each skills area, in turn, was broken down into individual competencies. In order for a participant to be deemed "competent" in any benchmark area, he or she had to pass through four levels of increasing difficulty.

The benchmarks served as the foundation for the CETOP curriculum with each benchmark being specified in behavioral terms as a learning objective. Instructional or counseling group activities were specially designed to facilitate this growth and development.

The following list presents CETOP's three competency areas, broken down into forty-one separate competencies.

I. Life Coping Skills
- Applications
- Signs and Symbols
- Community Resources
- Budgeting
- Self-Image
- Crisis Management
- School/Work Attitudes

II. Work Readiness Skills
  Section A: Long-Term Objectives
  - Completion of Requirements (Class)
  - Completion of Requirements (Job)
  - Performance Ratings
  - Attendance
  - Punctuality
  - Cooperation
  - Notification
  - Perseverance
  - Social Adjustment

Section B: Short-Term Objectives
- Communication Skills
- Questioning
- Directions
- Self-Perception
- Criticism
- Decision-Making
- Problem-Solving
- Employer Expectations
- Dress
- Labor Law
- Evaluation by Others
- Awareness of Experience
- Job Clusters
- Job-Search Skills
- Job Applications
- Resume Writing
- Interview Skills

III. Basic Academic Skills
- Reading Test Related
- Reading-Situation Based
- Computation
- Problem-Solving
- Writing
- Speaking
- Social Studies
- Science

Information about CETOP is available from:

- Mexican-American Unity Council, Inc.
  2300 West Commerce
  San Antonio, Texas 78207

- Manpower Demonstration Research Corporation
  3 Park Avenue
  New York, New York 10016

Following is a sample from the CETOP program manual including a description of benchmarks, assessment procedures, and standards for each competency area. For illustrative purposes, we have included only one competency from each of CETOP's three competency areas. The sample includes all four levels of difficulty for each competency.

CETOP

COMPETENCIES AREA: Life Coping Skills: School/Work Attitudes

BENCHMARK: LEVEL: 1 NUMBER: 7

Participants identify personal characteristics of successful worker/student and cite which of those characteristics they possess for goal attainment.

PEER SESSION: #18
PEER SESSION: #24
PEER SESSION: #25

PROCEDURE:

1. Activity #2: LCS1-7 Time: 20 minutes
   - a. Facilitator opens the session with the question, "If I were to ask a group of teachers/supervisors to describe you, what three words would they use?" Facilitator questions participants: "Are you happy with the description of yourself?" Facilitator proceeds to tell the group that this session will be focusing on characteristics of good participants
   - b. Facilitator asks participants to brainstorm the question, "What do you think good teachers/supervisors expect of good participants?" Facilitator might wish to make some suggestions (i.e., participation, good attendance, maturity, etc.) Facilitator marks down the participant's responses on blackboard or poster board
   - c. Facilitator asks participants to take some time out to look over the list and asks: "Do you fit any of these descriptions?" Facilitator distributes worksheet "My Attitude" LCS1-7 and instructs participants to list the descriptions that apply to them in the column marked "Characteristics I Possess"

MATERIALS:
1. Worksheet "My Attitude"
2. "Cooperation Squares Game"
3. "Murder Activity"

EVALUATION:

COMMENTS:

457

PROCEDURE: (cont'd)

- e. Facilitator instructs participants to look at those remaining characteristics that do not apply to them and asks them, "What keeps you from fitting the rest of these descriptions?" Participants are then instructed to briefly describe the characteristics they do not possess and list why not (i.e., maturity-I cut up with my friends in class/work) in the appropriate column

2. Activity #2 LCS1-7, LCS2-7, LCS3-7 Time: 45 minutes
   - a. Facilitator breaks up group into five subgroups and hands each subgroup one envelope containing parts of a square and an instruction sheet
   - b. The participants are instructed to open the envelope on signal, to read the instructions, and to do the exercise. Also, the facilitator reads the instructions to the group.
   - c. Facilitator watches the activity, noting such things as
     - 1) Was there a group leader?
     - 2) What actions by the group helped or hindered the completion of the activity?
     - 3) Did they have a good goal?
     - 4) How did the participant seem to feel about the activity?
     - 5) How did they proceed through the activity?
   - d. Facilitator leads a discussion using the questions listed on the handout
   - f. Facilitator asks participants to relate the activitiy to actual work-related activities
   - g. Facilitator asks the participant's input as to
     - 1) What are the characteristics of a good worker? How does your work fit into the rest of the company?
     - 2) What situations, attitudes, etc. contribute to satisfying and unsatisfying aspects of work/school setting?
     - 3) What are the characteristics of a good leader/teacher/supervisor?

3. Activity #3 LCS1-7, LCS2-7, LCS3-7 Time: 1 hour
   - a. Facilitator breaks up group into three subgroups and hands out to each subgroup one envelope containing the 21 clues and 5 questions to be answered
   - b. Facilitator watches the activity noting the same kinds of questions posed in step 3 of activity #2, PEER SESSION #24
   - c. Steps 4, 5, and 6 of activity #2, from PEER SESSION #24 are followed

COMPETENCIES AREA: Life Coping Skills: School/Work Attitudes

BENCHMARK: **LEVEL: 2 NUMBER: 7**

Participant identifies most satisfying aspects of work/school; lists changes he/she would like in work/school setting; and determines whether desired changes are realistic.

PEER SESSION: #18
PEER SESSION: #24
PEER SESSION: #25

PROCEDURE:

1. Activity #3: LCS2-7 Time: 20 minutes
   a. Facilitator begins a discussion by asking, "What is the most satisfying thing about school/work for you, what do you like the best?" Facilitator asks participants to write their answers on the worksheet "My Attitude" LCS1-7 under the column "Things I Like About School/Work"
   b. Facilitator next asks, "What is the most unsatisfying thing about school/work for you? What do you dislike about school/work?" Again, participants are instructed to write their answers down under the appropriate column. Facilitator instructs participant to look at the answers in this column and asks participants "Are there any changes that you could make that would make school/work more meaningful for you?" (i.e., I don't like it when teachers give me bad grades--if I studied more and goofed off less, I might make better grades)
   c. Facilitator instructs participants to write a short description of realistic changes that could be made and to enter these next to the corresponding answer

MATERIALS:
1. Worksheet "My Attitude"
2. "Cooperation Squares Game"
3. "Murder Activity"

EVALUATION:

COMMENTS:

C.2P

PROCEDURE: (cont'd)

d. Facilitator tells participants that they now have a pretty good picture of their attitude toward school/work. Facilitator brings closure to group by telling participants that they have also identified some problem areas and that these areas will be addressed in a later peer session on goal-setting. Facilitator collects papers to be referred to in Peer Session #19)

2. Activity #2 LCS1-7, LCS2-7, LCS3-7 Time: 45 minutes
   a. Facilitator breaks up group into five subgroups and hands each subgroup one envelope containing parts of a square and an instruction sheet
   b. The participants are instructed to open the envelope on signal, to read the instructions, and to do the exercise. Also, the facilitator reads the instructions to the group
   c. Facilitator watches the activity, noting such things as
      1) Was there a group leader?
      2) What actions by the group helped or hindered the completion of the activity?
      3) Did they have a good goal?
      4) How did the participant seem to feel about the activity?
      5) How did they proceed through the activity?
   d. Facilitator leads a discussion using the questions listed on the handout
   f. Facilitator asks participants to relate the activitiy to actual work-related activities
   g. Facilitator asks the participant's input as to
      1) What are the characteristics of a good worker? How does your work fit into the rest of the company?
      2) What situations, attitudes, etc. contribute to satisfying and unsatisfying aspects of work/school setting?
      3) What are the characteristics of a good leader/teacher/supervisor?

3. Activity #3 LCS1-7, LCS2-7, LCS3-7 Time: 1 hour
   a. Facilitator breaks up group into three subgroups and hands out to each subgroup one envelope containing the 21 clues and 5 questions to be answered
   b. Facilitator watches the activity noting the same kinds of questions posed in step 3 of activity #2, PEER SESSION #24
   c. Steps 4, 5, and 6 of activity #2, from PEER SESSION #24 are followed

COMPETENCIES AREA: Life Coping Skills: School/Work Attitudes

BENCHMARK: **LEVEL: 3 NUMBER: 7**

Participant identifies characteristics of a good teacher/supervisor and ways they can influence teacher/supervisor to exhibit those characteristics.

PEER SESSION: #18
PEER SESSION: #24
PEER SESSION: #25

PROCEDURE:

1. Activity #1: LCS3-7 Time: 20 minutes
   a. Facilitator tells group that the session will be focusing on the participants' attitude toward school/work and identifying problem areas that we might be able to change
   b. Facilitator asks group members to close their eyes and become as comfortable as possible. Participants are asked to remember at least one of their teachers/supervisors throughout the years who has made an impression on them. Facilitator asks participants to think about what made them special. Facilitator allows several moments of silence and then asks participants to open their eyes
   c. Facilitator asks participants to think of what characteristics these teachers/supervisors possess that make them so special
   d. Facilitator asks participants to brainstorm a list of these characteristics and posts their answers on a blackboard or poster board

MATERIALS: 1. Blackboard or poster board
2. "Cooperation Squares Game"
3. "Murder Activity"

EVALUATION:

COMMENTS:

PROCEDURE: (cont'd)

e. Facilitator brings closure to activity by asking "What can you as participants/workers do to help teachers/supervisors participant will usually elicit positive response from teacher/supervisor)

2. Activity #2 LCS1-7, LCS2-7, LCS3-7 Time: 45 minutes
    a. Facilitator breaks up group into five subgroups and hands each subgroup one envelope containing parts of a square and an instruction sheet
    b. The participants are instructed to open the envelope on signal, to read the instructions, and to do the exercise. Also, the facilitator reads the instructions to the group.
    c. Facilitator watches the activity, noting such things as
        1) Was there a group leader?
        2) What actions by the group helped or hindered the completion of the activity?
        3) Did they have a good goal?
        4) How did the participant seem to feel about the activity?
        5) How did they proceed through the activity?
    d. Facilitator leads a discussion using the questions listed on the handout
    f. Facilitator asks participants to relate the activitiy to actual work-related activities
    g. Facilitator asks the participant's input as to
        1) What are the characteristics of a good worker? How does your work fit into the rest of the company?
        2) What situations, attitudes, etc. contribute to satisfying and unsatisfying aspects of work/school setting?
        3) What are the characteristics of a good leader/teacher/supervisor?
3. Activity #3 LCS1-7, LCS2-7, LCS3-7 Time: 1 hour
    a. Facilitator breaks up group into three subgroups and hands out to each subgroup one envelope containing the 21 clues and 5 questions to be answered
    b. Facilitator watches the activity noting the same kinds of questions posed in step 3 of activity #2, PEER SESSION #24
    c. Steps 4, 5, and 6 of activity #2, from PEER SESSION #24 are followed

COMPETENCIES AREA: Life Coping Skills: School/Work Attitudes

BENCHMARK: **LEVEL: 4 NUMBER: 7**

After lecture on criteria for goal setting, participants identify what they would like to be doing in five/ten years; ways in which school/work relates to these goals; and personal changes they may wish to make.

PEER SESSION: #20

PROCEDURE:

Activity #5: LCS4-7 Time: 30 minutes

A. Facilitator distributes "Future" worksheet and instructs participants to complete it

B. When participants are finished, the facilitator solicits responses on the activity. The facilitator may wish to start a discussion on obstacles to future goals. Facilitator discusses the importance of knowing about what we want to do in the future (long and medium range goals) so that we may be aware of what may get in the way, what we need to be doing to prepare, especially in regards to our education

C. Facilitator brings closure to the group by stressing the importance of goals. Facilitator tells group that goals help in educational and career planning and help the person to be more responsible in relation to peers, parents and school personnel

MATERIALS: Worksheet "Future"

EVALUATION:

COMMENTS:

CETOP

COMPETENCIES AREA: Work Readiness: Communication Skills
Section B: Short-Term Objectives

BENCHMARK: **LEVEL: 1 NUMBER: 10**
Participant demonstrates listening skills during counseling group activities.
PEER SESSION: #1
PEER SESSION: #2

PROCEDURE:

1. Activities #1, #2, #3 "Warm Up Activities"
   Purpose: To help develop group cohesiveness and trust
   Time: 45 minutes
   Benchmark: WR-10
2. Activity #4 WR1-10 Time: 15 minutes
   a. Facilitator reviews session on orientation and describes how a lack of communication can change messages and distort communication
   b. Facilitator describes listening, responding, and questioning skills
   c. Facilitator asks group for example of times when they felt that someone misunderstood what they had said. What happened? How did you feel about this?
3. Activity #5 WR1-10 Time: 20 minutes
   a. Have group members pair up. One person speaker/other is listener
   b. Have speaker describe an exciting event that has happened to him/her in the last couple of weeks
   c. Listener uses listening skills and then responds so that the speaker knows he/she has been heard and understood. Obtain feedback
   d. Switch roles. Go through same procedure

MATERIALS: Handout "Communication Skills"

EVALUATION:

COMMENTS: Activities #1, #2, #3 do not meet a specific level of the communication benchmark, but they help to develop group cohesiveness and trust.

CETOP

COMPETENCIES AREA: Work Readiness: Communication Skills
Section B: Short-Term Objectives

BENCHMARK:

LEVEL: 2 NUMBER: 10

After presentation on "I" messages, participants demonstrate their use in simulation by completing a peer group activity.

PEER SESSION: #3

PROCEDURE:

Activity #6 WR2-10 Time: 25 minutes

a. Facilitator gives lecturette on I-Messages
b. Facilitator distributes conflict situations "I-Messages" WR2-10
c. Participants respond to situations from I-Messages point of view
d. The I-Messages are contrasted with You-Messages
e. When all conflict situations are responded to, the facilitator summarizes both activity and the session

MATERIALS: 1. Lecturette
2. "Conflict Situations"

EVALUATION:

COMMENTS:

CETOP

COMPETENCIES AREA: Work Readiness: Communication Skills
Section B: Short-Term Objectives

BENCHMARK: **LEVEL:** 3 **NUMBER:** 10

Given a situation, participant identifies instances of miscommunicaton.

PEER SESSION: #4

PROCEDURE:

Activity #7 WR3-9, WR3-10 Time: 20 minutes

a. Facilitator explains verbal and non-verbal communication. (Facilitator's guide "Verbal and Non-verbal Communication" WR3-10)
b. Facilitator discusses different ways of non-verbal communication (clothes, jewelry, type of car driven, style of home bought. Other ways people communicate non-verbally is by body posture, expressions, gestures, etc.)
c. Facilitator distributes handout on non-verbal behavior, "You Can't Not Communicate" WR3-10
d. Participants practice various emotions non-verbally
    1. Facilitator models first emotion
    2. Facilitator asks for volunteers to model non-verbal emotions
    3. Facilitator has the group guess which emotion the youth is portraying
e. Facilitator summarizes activity and relates communication to job situations

MATERIALS:
1. Facilitator's guide "Verbal and Non-verbal Communication"
2. Handout "You Can't Not Communicate"
3. "Activity, Communicating Non-Verbally"
4. Situation sheets

EVALUATION:

COMMENTS: Activities #9 and #10 may be substituted for Activity #7
See PEER SESSION #4

CETOP

COMPETENCIES AREA: Work Readiness: Communication Skills
Section B: Short-Term Objectives

BENCHMARK: LEVEL: 4 NUMBER: 10

Participant role plays a stressful communication situation effectively.

PEER SESSION: #4

PROCEDURE:

Activity #8 WR3-9, WR4-9, WR4-10 Time: 30 minutes

a. Facilitator describes stressful situation - reads situation from handout "Speaking" WR3-9, WR4-9, WR4-10
b. Facilitator asks for two volunteers to role play the situation of employer-employee relationship
c. Facilitator has group members process situational role play
    1. What went on here?
    2. What emotions were present?
    3. What did each want to communicate?
    4. How could each have communicated more effectively?
d. Facilitator has the two members do the role play again, utilizing the feedback obtained from the group
e. If the two members have problems with the role play, the facilitator can either ask the group to help him/her out by modeling or either step in and do the role play him/herself

MATERIALS: Handout "Speaking"

EVALUATION:

COMMENTS:

CETOP

COMPETENCIES AREA: Basic Academic Skills: Computation	
BENCHMARK: Participant scores 80% on test of basic addition and subtraction.	LEVEL: 1 NUMBER: 3
PROCEDURE: 1. Participant will complete addition skills inventory and subtraction skills inventory 2. Instructor will perform an error analysis on participant's inventories and will make assignments to address participant's weaknesses 3. Participant will take a test on addition and subtraction	
MATERIALS: 1. Number Power or equivalent math text 2. Worksheets 3. PLATO System	
EVALUATION: 80% accuracy	
COMMENTS: In-school participant must pass a basic math course with at least a C average or demonstrate those math skills on an achievement test	

CETOP

COMPETENCIES AREA: Basic Academic Skills: Computation

BENCHMARK:
Participant scores 80% on test of basic multiplication and division.

LEVEL: 2 NUMBER: 3

PROCEDURE:

1. Participant will complete a multiplication inventory and a division inventory
2. Instructor will perform an error analysis on participant's inventories and will make assignments to address participant's weaknesses
3. Participant will take a test on multiplication and division

MATERIALS:
1. Number Power or equivalent math text
2. Worksheets
3. PLATO System

EVALUATION: 80% accuracy

COMMENTS:
In-school participant must pass a basic math course with at least a C average or demonstrate those math skills on an achievement test

COMPETENCIES AREA: Basic Academic Skills: Computation	
BENCHMARK: Participant scores 80% on test of basic fractions and decimals.	**LEVEL: 3 NUMBER: 3**
PROCEDURE: 1. Participant completes a fractions skills inventory and a decimals skills inventory 2. Instructor performs an error analysis on participant's inventories and makes assignments to address weaknesses 3. Participant takes a test on fractions and decimals	
MATERIALS: 1. Number Power 2 or equivalent math text 2. Worksheets 3. PLATO System	
EVALUATION: 80% accuracy	
COMMENTS: In-school participant must pass a basic math course with at least a C average or demonstrate those math skills on an achievement test	

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BAS4-3

CETOP

COMPETENCIES AREA: Basic Academic Skills: Computation

BENCHMARK:

LEVEL: 4 NUMBER: 3

Given an examination covering basic math skills, including word problems, percent, area, perimeter, and metrics, participants will score at least 80%.

PROCEDURE:

1. Participant completes skills inventories on word problems, percent, area and perimeter, and metrics
2. Instructor performs an error analysis on participant's inventories and makes assignments to address weaknesses
3. Participant takes GED Practice Test

MATERIALS:

1. Number Power 2 or equivalent math text
2. Worksheets
3. GED Practice Test
4. PLATO System

EVALUATION: 80% accuracy

COMMENTS:

In-school participant must pass a basic math course with at least a C average or demonstrate those math skills on an achievement test

Appendix II: An Annotated Resource Guide

As suggested in the Introduction to Competency-Based Employment and Training Programming for Youth, there are already in existence a vast array of assessment and benchmarking instruments and systems. Many of these tools have been used by the education community, vocational counseling community and human resources community for years. While SDAs and youth program staff may choose to develop their own assessment tools, the appropriate use or adaptation of existing systems may significantly shortcut the process of implementing a competency-based system under JTPA.

This appendix represents a first step in introducing the employment and training community to the world of competency assessment. As such, it contains brief summaries of a representative range of commonly used assessment instruments and systems. It should be emphasized, however, that the sample of assessment tools summarized below is meant neither to be exhaustive nor prescriptive. The instruments included below certainly do not represent all available competency assessment tools; the inclusion of a given instrument also does not imply an endorsement of its use. Furthermore, the authors make no claim as to the validity, reliability or appropriateness of any given example.

This appendix is organized as follows:

Section 1 contains brief abstracts of several hundred assessment instruments and systems. The abstracts are organized into categories by competency area, as follows:

A. Multi-dimensional assessment instruments
   1. Pre-employment and work maturity/basic educational skills/job specific skills
   2. Pre-employment and work maturity/basic educational skills
   3. Pre-employment and work maturity/job specific skills
   4. Basic educational skills/job specific skills

B. Pre-employment and work maturity assessment instruments

C. Basic educational skills assessment instruments

D. Job specific skills assessment instruments

E. Other useful instruments
   1. Pre-testing procedures
   2. Vocational choice instruments

Each abstract concludes with the publisher of the instrument noted in parentheses. Section 2 of this appendix is an alphabetical listing of publishers' addresses. Finally, Section 3 of this appendix is a bibliography of articles and books on competency-based systems in employment, vocational training and education.

A. MULTI-DIMENSIONAL ASSESSMENT INSTRUMENTS

1. Pre-employment and work maturity/basic educational skills/job specific skills.

Career Passport Program - The National Institute for Work and Learning's Career Passport Program is designed to fill a gap that many young people face when they consider entering the full-time labor market or continuing their education/training beyond high school. The Career Passport represents a formal document which is useful for job search and college applications because it documents the skills, abilities, and knowledge that have been gained through work and non-work experiences. The process of developing the Career Passport is a natural counseling tool which helps young people discover the strengths, weaknesses, and gaps in their experiences. The program also provides a framework for discussing such specifics as application procedures, interviews, and educational and career planning.

The Career Passport Program has been useful to both in-and-out-of-school youth. It helps them describe and document their work experiences, in-school activities, community and volunteer activities, hobbies, and home responsibilities; and then translate these into skills, competencies, knowledge, and interests.

A Career Passport Program consists of: a youth workbook to collect information on experiences, a leader's guide to assist adults in delivering the service to youth, a system of processing, storing, and updating the information and a format for the Career Passport. A typical Career Passport would include the following: background information, job experience, other experiences (hobbies, volunteer, community, school, family), education and training, skills, abilities and interests, education/career plans, and references. (National Institute for Work and Learning).

Career Planning Program - CPP is a guidance-oriented assessment program which collects, integrates, and reports information relevant to students' career planning. It assesses interests, experiences, and abilities, and helps the student identify and explore personally relevant career options. The CPP Vocational Interest Profile measures knowledge of, or skill in: business contact, business detail, trades, technical, science, health arts, and social service. Six abilities are also assessed, including reading skills, numerical skills, language usage, mechanical reasoning, clerical skills, and space relations. (American College Testing Program).

Consolidated Youth Employment Program - The CYEP demonstration was structured to provide a developmental framework to parallel the maturation process of youth in making the transition from school to work. Benchmarks of achievement were established locally to assess and document progress of participants towards the basic competencies required for successful employment. These four skill areas were: pre-employment, work maturity, educational, and occupational.

CYEP incorporated competency based assessment and service delivery systems to enhance the individualized acquisition of skills. The Job Corps Training Achievement Record was helpful in designing benchmarks for occupational skills. Standardized testing procedures were used by the primes operating the CYEP to varying degrees. (Osoro & Associates).

Experience Based Career Education Project of the National Institute of Education - EBCE a) involves people and facilities in the community as a principal resource for student learning and program development and b) uses guidance and instructional activities to help students acquire competencies in dealing with the problems and decisions of adult life. This approach balances academic, personal, and vocational development with the subsequent requirement of career related activities for all students and emphasizes the development of general rather than job specific career skills.

In the initial EBCE Project conducted by NIE, the programs used standardized and specially developed tests to measure program effects on students in three basic areas: career development, reading and mathematics skills, and attitudes toward school and learning. Results on these tests were compared with those from randomly selected control groups at local high schools.

The Career Maturity Inventory was used to measure student career development. First and second year students showed significant growth on this measure. Program effects on student career interests were also measured by the Self Directed Search.

The Comprehensive Test of Basic Skills was the primary instrument being used to measure student reading and mathematics skills.

A number of different attitude measures were used by the projects to reveal effects of program activities on how students felt about themselves, about people they were working with, about school, about different career areas, and about learning in general. (National Institute of Education).

Interview Guide - This instrument provides an organized format and process for conducting comprehensive employability assessment interviews. (The Psychological Corporation).

Skill Center Advanced Training and Employment Program - The SCATE program is a national youth demonstration project, funded by the U.S. Department of Labor, to assist youth in preparing for and finding career employment. The project is designed to provide a complete spectrum of training and employment services through an individualized career development program for out of school youth ages 16 to 21, in Hampden County, Massachusetts who are experiencing the most severe barriers to employment.

Once youth are selected for the program, they receive a comprehensive assessment by vocational counselors and specialists, using a wide variety of survey instruments, assessment tools, and testing devices. These include the Singer Graflex, General Aptitude Test Battery, Test of Adult Basic Education, Work Sampling, Bennett Mechanical, General Clerical, and other specialized assessment devices.

Based upon these extensive assessments, as well as on a series of hands-on vocational exploration projects in various skills training areas, an individualized career development plan is prepared for each youth. This plan takes into account the particular needs and capabilities of each individual, as well as the youth's level of performance and previously acquired competencies. The youth then progresses through a series of benchmarked activities based on an individualized training program.

The training program includes a benchmarking system which is used to document and certify competencies acquired by SCATE graduates, as they develop those skills necessary to compete successfully in the labor market. Four distinct benchmarks have been developed. These four bencmarks, and their associated program activities are:

(1) Basic Employability Skills - a two week preparatory phase designed to provide youth with information regarding career options, awareness of the world of work, and job search techniques.

(2) Work Maturity - a 10 to 20 week work experience activity, designed to develop in youth the ability to maintain continuity of employment, including regular attendance, punctuality, positive attitudes toward fellow employees and supervisor, and diligent work effort.

(3) Educational Competencies - an individualized educational remediation activity to provide youth with academic and communication skills, including GED completion, commensurate with career goals.

(4) Vocational Competencies - an intensive skills training program, up to 36 weeks in length, designed to provide youth with specific entry level skills for access to career employment.

Each of these competency areas has standards of performance, and progression through the program is determined by successful attainment of these benchmarks. (Hampden County Employment and Training Consortium).

Texas Adult Performance Level Project - This is a competency based system of education that combines the diagnosis, prescription, teaching, evaluation and credentialing of life-coping skills. A complete curriculum applies reading, writing, speaking-listening-viewing, computation, problem-solving, and interpersonal relations skills to the content areas of consumer economics, occupational knowledge, health, community resources, and government and law. For example, adults might learn how to read job descriptions or open savings accounts. The curriculum provides the activities and materials needed to teach toward each of the APL life-coping skills objectives. Printed materials are supplemented with filmstrips and cassette tapes. A pre/post diagnostic instrument for each objective is also included.

The APL competency-based high school diploma program offers adults a relevant alternative to the conventional four-year high school diploma and to the General Educational Development Test (GED). Adults can earn a regular high school diploma by demonstrating competencies gained through life skills-oriented adult education programs in combination with those gained through experience. The basic steps to the competency-based diploma are: a) placement tests, b) competency based curriculum, c) a series of life skills activities, and d) demonstration of a marketable entry-level job skill or post secondary education readiness or skills in home management/maintenance. (University of Texas at Austin - Continuing Education).

2. Pre-employment and work maturity/basic educational skills

California Adult Student Assessment System - This comprehensive educational assessment system is being developed to assist adult education programs in implementing competency based curricula in local instructional programs. The four major goals of CASAS are:

a) to provide effective assessment materials and procedures for correct placement of adult students into adult programs from beginning through advanced levels of ABE and ESL as well as high school completion programs,

b) to provide effective assessment for measuring student achievement in a competency-based adult education program,

c) to provide effective assessment for certifying attainment of competencies required for local certification programs, and

d) to provide effective assessment materials and procedures that are adaptable to a variety of educational settings and are linked to the competency-based curriculum goals and instructional programs.

These goals are being met through the cooperative activities of CASAS, which is a consortium of districts and agencies that provide educational services to adults. Such organizations need a comprehensive life skills assessment system in order to place adults at all levels of functioning in appropriate Competency Based Adult Education programs, and to measure their progress.

The Consortium model utilizes the resources and expertise of its members, and this cooperative effort provides a comprehensive adaptability. Implementation of competency-based programs require that assessment be designed to directly reflect the curriculum and instruction. Course outlines are being revised to include these competencies, and curriculum materials have been identified that provide a life skills content. The CASAS assessement design includes a bank of test items and facilitates the development of tests for specific purposes. Districts may choose test items to construct placement, achievement, and certification tests that match their programs and educational objectives. (California Adult Student Assessment System).

Job Interest and Literacy Level Evaluation Instrument - JILL contains two main parts. The first is a self-administered checklist which elicits perceptions of what the client wants to do, how he or she wants to do it, and how well the client thinks he or she can perform. The extent to which the client thinks he can perform is the measure of aptitude. The checklists for interest and aptitude, therefore, are subjective measures. The second is a test of literacy or basic skills, and includes nine questions. The first three correspond to sixth-grade level skills, the next three to eighth-grade level skills, and the last three to twelfth-grade level skills. Questions 1, 4, and 7 involve the use of reading skills. Questions 2, 5 and 8 involve the use of writing skills. Questions 3, 6 and 9 are computation items. The test ranges from easy to difficult. There is always the option of "I don't know" and clients are encouraged to check this response rather than guess. This instrument was designed for use with CETA clients. The JILL can be self administered or filled in by the counselor. It can be done in groups or individually. A counselor can read the instrument to the client and record answers in about a half hour or less. A person with eighth grade reading skills can complete the two parts on his or her own in 15-30 minutes. (University of Texas at Austin).

Priority Counseling Survey - PCS was designed to identify educational and vocational counseling needs and priorities. The junior high forms deal with educational self-appraisal and help needed. The high school and junior college forms deal with areas such as career interest and skills and course of study and help needed. (Minicomp Corporation).

3. Pre-employment and work maturity/job specific skills

Beta - This instrument is a performance oriented intelligence test which is used along with the USES GATB. The revised BETA test includes six areas: a) ability to pay attention, to plan, and to use foresight, b) ability to perform repetitive tasks that involve new learning and short-term memory, c) abstract concepualization skills, d) capacity to perceive spatial relationships, e) ability to differentiate essential from non-essential details, and f) visual discrimination tests that measure clerical skills, speed, and accuracy. (The Psycholological Corporation).

Cleff Job Matching System - Cleff was designed to match jobs and job applicants at lower skill levels for both white and blue-collar occupations. This approach assumes that people seek out those work activities which they feel present the best prospects for success. CJMS developed a common language for describing the content and work environment of lower level jobs, and the characteristics, experiences and preferences of those seeking to fill those positions. The complex matching process determines which of the available openings best suits a particular applicant. (Center for Human Technology).

Comprehensive Occupational Assessment and Training System - COATS is intended for youth and adults in employment and training programs. It was basically designed for client (or student) self-interpretation followed by activities to change behavior. COATS contains four systems: a) job matching—matches person and preferences, experiences, and abilities to employment and/or training opportunities, b) employability attitudes—compares person's work values with employers' work values, c) work sample—contains 26 work samples (i.e., Masonry, Nutrition, Real Estate), and d) living skills—assesses literacy skills and knowledge. Each component can be used independently. (PREP, Inc.).

Experience Exploration - This is a career decision-making model based on evaluation of experience. It relates self-assessed experiences to the world of work and contains the following sections: a) an experience survey, b) experience in school subjects, c) perceived abilities, d) experiences with data-people-things, e) a work value inventory, and f) expected educational level. Interpretation reveals a series of job titles with DOT number. (Chronicle Guidance).

Geist Picture Interest Inventory - GPII reports 11 or 12 interest scores including persuasive, clerical, mechanical, musical, scientific, outdoor, literary, computational, artistic, soical service, dramatic, personal service (females only) and 7 motivational scores including family, prestige, financial, intrinsic and personality, environmental, past experience, could not say. It has male and female versions. (Western Psychological Services).

Hester Evaluation System - Hester's twenty-six separate performance and paper and pencil tests are used to measure 28 ability scores. Computer printouts report scores on each test, show level of functioning based on Data-People-Things hierarchy, and list specific DOT job titles sorted from most feasible to least feasible. (Evaluation Systems, Inc.).

Nurses Attitudes Survey - NAS is a multiple choice test for prospective nursing students. Scores are provided on attitudes related to nursing, self, home-family responsibility, others-love-marriage, and academics. (Nursing Research Associates).

Rating Scales for Vocational Values, Interests and Aptitudes - The purposes of VVIA are: to integrate a student's self-assessment of vocational values, interests, and aptitudes for several occupational areas, to determine the extent of interest in 20 areas applicable to career planning, to ascertain the degree of aptitude a person believes he or she possesses in each, and to discover the amount of value a person places on each of these classifications. (Educational and Industrial Testing Service).

San Francisco Vocational Competency Scale - SFVCS is designed to rate mentally retarded adults for participation in sheltered-workshops and other workshop programs. It covers four areas: motor skill, cognition, responsibility and social-emotional behavior. (The Psychological Corporation).

Vocational Interest, Temperament and Aptitude System - VITAS is composed of 21 work samples covering 15 worker trait group arrangements of the DOT, 3rd ed., and 16 work groups with four work areas in the DOT, 4th ed.. Interests are assessed through a structured interview and temperament is assessed through observation of clients performing the samples. VITAS provides a descriptive assessment of functional skills and quantitative scores for constructing IEPs, vocational placements, and training strategies. It is appropriate for the economically/educationally disadvantaged with less than a 12th grade education, as well as special needs high school students. The process requires 3 five hour days. Scores are reported on: nuts, bolts and washers assembly; packing matchbooks; tile sorting and weighing; collating material samples; verifying numbers; pressing linens; budget book assembly; nail and screw sorting; pipe assembly; filing by lettrs; lock assembly; circuit board inspection; calculating; message taking; bank teller; proofreading; payroll computation; census interviewing; spot welding; laboratory assistant; and drafting. (Vocational Research Institute—Jewish Employment and Vocational Service).

4. Basic educational skills/job specific skills

Armed Services Vocational Aptitude Battery (Form 5) - Form 5 of the ASVAB was developed for civilian use by high school counselors and military recruiters. Its purposes are to: a) provide information useful in career guidance and vocational exploration, and b) furnish service repreantatives with test score information on 11th and 12th grade students. Six composite scores are provided in verbal, math, perceptual speed, mechanical, trade technical, and academic ability. Total administration time is 180 minutes. (U.S. Military Enlistment Processing Command, Fort Sheridan, Illinois).

Armed Services Vocational Aptitude Battery - Forms 8, 9, 10 - ASVAB is a multi-factor aptitude testing battery which is currently used as the lead assessment technique for qulaification for and assignments to duty following military enlistment. The current alternate forms of the ASVAB (Forms 8, 9, and 10) each consist of ten subtests: general science, word knowledge, arithmetic reasoning, paragraph comprehension, numerical operations, coding speed, auto/shop information, mathematics knowledge, mechanical comprehension, and electronics informaion. ASVAB requires about 180 minutes to complete. (Air Force Human Resources Laboratory).

CLEP Subject Examination in Computers and Data Processing - This test is appropriate for assessment of educational achievement, advanced placement, or college accreditation of nontraditional study. There are two parallel editions—90 and 45 minutes in length. (Educational Testing Service).

Differential Aptitude Tests/DAT Career Planning Program - DAT offers an integrated battery of aptitude tests, with scores, provided in verbal reasoning, numerical ability, abstract reasoning, clerical speed and accuracy, mechanical reasoning, space relations, spelling, and language usage. The target population encompasses grades 8-12. Total administration time is 235 minutes. (The Psychological Corporation).

Employee Aptitude Survey - Designed primarily for industrial use, this battery measures the following: verbal comprehension, numerical ability, visual pursuit, visual speed and accuracy, space visualizaton, numerical reasoning, verbal reasoning, word fluency, manual speed and accuracy, and symbolic reasoning. The test for each item is only 5 minutes in length. (Psychological Services, Inc.).

Industrial Reading Test - IRT was designed as a screening device with applicants or trainees for technical or vocational training programs. Representing an alternative approach to the measurement of reading skills, it is specifically constructed so that individuals for whom the test is intended will find the material directly relevant and meaningful. Some of the reading passages are representative of sections encountered in technical manuals, while others are written in the form of a company memorandum. Good performance on the test is not dependent on previous knowledge of the subject. Appropriate for 9th-12th grades and adults, IRT takes 40 minutes to complete. (The Psychological Corporation).

USES Non Reading Aptitude Test Battery - The NATB was designed by the United States Employment Service as an alternative to the General Aptitude Test Battery to test the occupational aptitudes of persons who do poorly on standard tests because of a lack of reading skills. Instructions and quesions are read aloud by test administrators so clients need not be able to read at all. Both the NATB and GATB provide scores for the following aptitudes: (G) general learning ability, (V) verbal aptitude, (N) numerical aptitude, (S) spatial aptitude, (P) form perception, (Q) clerical perception, (K) motor coordination, (F) finger dexterity, and (M) manual dexterity. NATB measures the first six aptitudes through materials and situations most familiar to the disadvantaged. Use of coins, tools and pictures are illustrative of this approach. The last three aptitudes are determined by the same tests in both batteries, since these do not require any reading. Total administration time required is 107 minutes. (U.S. Government Printing Office).

Wechsler Adult Intelligence Scale - WAIS encompasses two scales—Verbal and Performance—and provides scores on the following items: information, comprehension, arithmetic, similarities, digit span, vocabulary, digit symbol, picture completion, block design, picture arrangement, and objects assembly. Both speed and accuracy of performance are taken into account in scoring. (The Psychological Corporation).

Wonderlic Personnel Test - WPT is a 12 minute test of general learning ability, including numerical, verbal and spatial aptitudes. It has been widely used in screening applicants for jobs at various levels, especially in private industry. (E.F. Wonderlic & Associates, Inc.).

B. PRE-EMPLOYMENT AND WORK MATURITY ASSESSMENT INSTRUMENTS

Assessment of Career Development - ACD was designed for use with 8th through 11th grade students as a career guidance development tool. Its purpose is to obtain information needed in formulating effective programs tailored to student needs. The instrument's scales measure occupational awareness (knowledge, exploratory experiences), self awareness (job values and preferences, career plans, self evaluation, perceived needs), and career decision making (career planning knowledge, involvement in career planning experiences). ACD can be administered in 125 minutes. (American College Testing Program).

California Life Goals Evaluation Schedules - CLGES is an inventory based on ten career areas: esteem, profit, fame, power, leadership, security, social service, interesting experiences, self-expression, and independence. It is suitable for persons ages 15 and over (Western Psychological Services).

Career and Occupational Development Exercises - COD measures students' attainment of career and occupational objectives related to: a) preparing for making career decisions, b) improving career and occupational skills, c) possessing skills that are generally useful in the world of work, d) practicing effective work habits, and e) having positive attitudes toward work. (National Assessment of Educational Progress).

Career Awareness Inventory - CAI measures the awareness of a variety of careers. It is designed around the functions, contents, status, requirements, lifestyle and experiences typical of twelve occupational clusters. Total administration time is 60-90 minutes. (Scholastic Testing Service, Inc.).

Career Awareness Skills - CAS shows how much a student knows about the following aspects of education, work, and leisure opportunities and how well he/she can use the information: a) relating abilities, values, needs and experiences to career choices, b) locating, evaluating, and interpreting information for career choices, c) knowing facts about career opportunities, and d) finding out about educational requirements for occupations. It takes about 60 minutes to complete. (The College Board).

Career Decision-Making Skills - CDMS reveals skills, knowledge and techniques of a student necessary for informed career decision-making: a) define a problem, b) establish an action plan, c) clarify values, d) identify alternatives, e) discover probable outcomes, f) eliminate alternatives systematically, and g) start action. It takes about 60 minutes to complete. (The College Board).

Career Development Inventory - CDI assesses attitudes, knowledge and skills related to career development, vocational maturity, and readiness to make pre-occupational and vocational decisions. Scores are provided on career planning and exploration, decision-making, world of work information, and understanding of preferred occupational group scales. Total administration time is 60-85 minutes. (Consulting Psychologists Press, Inc.).

Career Education Affective Assessment Questionnaire - This instrument assesses students' feelings about a wide range of concepts related to the world of work. It is designed to be administered to a class in 30-45 minutes. (Minnesota Research Coordinating Unit for Vocational Education - University of Minnesota).

Career Education Career Concepts Test - This instrument determines students' knowledge of career concepts. It has fifty multiple choice items, with no time limit. (Ontario-Montclair School District).

Career Education Cognitive Questionnaire - This instrument assesses students' knowledge about a wide range of concepts related to the world of work. The following areas are included: a) industry, b) occupational levels, c) ability requirements, d) needs (and/or job satisfaction), e) working conditions (or characteristics), f) career decision process and g) employment trends. It takes 30-45 minutes to complete. (Minnesota Research Coordinating Unit for Vocational Education - University of Minnesota).

Career Education Readiness Test - CERT measures student attitudes and knowledge regarding: a) sex role stereotyping, b) intrinsic and extrinsic reasons for working, c) occupational esteem, d) awareness of vocational concepts, e) occupational responsibilities, and f) world of work vocabulary. (Career Education Readiness Measurement and Research).

Career Guidance Assessment - CGA determines knowledge of career awareness, concepts of self in relation to the work world, and constructive use of these understandings as applied to the process of career choice. (Connecticut State Board of Education).

Career Information - CI assesses mastery of knowledge pertaining to career information, occupational supply and demand, job characteristics, and individual needs and interests as they all relate to career choice. (TEXAS Education Agency).

Career Maturity Inventory - CMI measures attitudes and competencies relating to career choice for individuals at the 6th to 12th grade levels. Scores are provided in the areas of self appraisal, occupational information, goal selection, planning and problem solving. Test time is approximately 160 minutes. (CTB/McGraw-Hill).

Career Orientation Battery, Form 58 - COB assesses students' knowledge of and attitudes toward objectives related to technology, self-esteem, attitudes toward school, attitudes toward work, decision-making skills, and the world of work. (New Educational Directions, Inc.).

Career Skills Assessment Program - CSAP determines competencies in the following career development skill areas: self-evaluation and development, career awareness, career decision making, job-seeking, work effectiveness, and personal financial management. The self evaluation and development skills measure assesses self-knowledge in the area of career planning, with an emphasis on personal values, interests, strengths, and weaknesses. The career awareness skills measure assesses knowledge about opportunities in work, education, and leisure. The work effectiveness skills measure is concerned with problems of interpersonal relations, value conflicts, supervision, work habits, and work attitudes on the job. The remaining measures, career decision making skills, employment seeking skills, and personal economics skills are self-explanatory. Intended populations for use of the measures include high school students and adults in continuing education settings such as community colleges, vocational institutes, and some four year colleges. Each measure consists of sixty to seventy multiple-choice quesions and is designed to be administered in 45-60 minutes. (The College Board).

Colorado Battery - This series of tests was developed for use in work with the seriously disadvantaged. The Social Access Quesionnaire contains 89 items measuring six personality factors. It also contains questions about personal history. This test was designed to tap social and personality characteristics that contribute to "job deviance." Subjects fill out the measure either individually or in large groups. The Work Requirements Rating Scale is a 47-item questionnaire dealing with behavior on the job and is designed to measure the consequences of differing vocational attitudes among worker, supervisor and employer. The Importance Questionnaire is a test of 20 items relating to job conditions or opportunities, each rated on a scale of from very important to very unimportant. The Employment Satisfaction Questionnaire has 20 items measuring job satisfaction on a scale from very unsatisfied to very satisfied. The Job Conditions Questionnaire is an 8-page questionnaire concerning perceived work environment. The Job Expectancy Rating is a single-page rating for for evaluation by workers of six basic job conditions. The Job Importance Prediction Scale is a 12-item scale filled out by workers and supervisors to check for congruencies and discrepancies between the two groups regarding important job conditions. (Colorado State University).

Employee Competency Scale - ECS provides supervisory ratings for employees on the following scales: communication, dependability, attitude, job competence, and leadership. This instrument takes 10-20 minutes to complete. (Psychologists and Educators Press).

Employment Readiness Scale - ERS was designed to measure a person's readiness for work by assessing work values. It is especially applicable for high school students going to work upon graduation in an unskilled, semi-skilled or skilled employment setting. (Anthony M. Alfano).

Employment Seeking Skills - ESE assesses skill and knowledge in the following aspects of seeking employment: a) anticipating job prospects, b) finding and interpreting facts and sources of information about available jobs, c) identifying appropriately written letters, resumes, and application forms, d) describing appropriate appearance and behavior as one is interviewed and evaluated for a job, and e) evaluating when a specific job fits a person's needs and interests. It takes about 40 minutes to complete. (The College Board).

Goodwin Work Orientation Questionnaire - The WOQ was developed to measure attitudes, goals, beliefs, and intentions regarding the world of work. The instrument consists of several sets of questions about work that are rated on a scale of responses from "agree" to "disagree." (The Brooking's Institution).

How I See Myself, Secondary Form - This instrument measures self esteem for individuals at the 9th-12th grade levels, and takes about 20-30 minutes to complete. (School of Education--UNC, Chapel Hill).

Indik Work Motivation Scales - This is an interview format test designed to estimate work motivation. The interviewer reads a collection of statements and asks the interviewee whether he/she agrees strongly, agrees mildly, is undecided, disagrees mildly, or disagrees strongly. Also, data are collected by having the interviewee choose one of four possible endings to unfinished statements read by the interviewer. Six areas of motivation are assessed: the motive to work, the motive to avoid work, the expectancy to work, the expectancy to avoid work, the incentive to work and the incentive to avoid work. (Rutgers University).

Job Analysis and Interest Measurement - This instrument measures coping skills important to performance and satisfaction in work roles. It was designed to measure factors such as "getting along" (coping) by determining the degree of match between requirements and potentials of jobs and the individual's self reported behavior, activity preference, and values. JAIM provides scores for 32 specific scales including self-confidence, orderliness, perseverance, assertiveness, dependability, and emotional control. Completion time is 30-40 minutes. (JAIM Research, Inc.).

Job Acquisition and Retention - JAR measures mastery of objectives pertaining to job location and interview skills, as well as knowledge and understanding of job retention skills. (TEXAS Education Agency).

Job Corps Revised World of Work Program - The World of Work Program is an individualized, competency-based, open entry-open exit effort to provide Corps members with job search, employability and adult survival skills, occupational knowledge, and consumer economies. Students are pretested for mastery in each major skill area and assigned to study only the areas that they have not mastered. A study plan is developed for every individual. In each area of assigned study, students are required to master specific objectives in order to advance and complete the program. Additionally, each youth develops a set of applied skills (resume, sample application forms, interview techniques) which provide real evidence of his/her mastery. (Job Corps).

Jorganson Interpersonal Relationship Scales - JIRS contains two instruments designed for a research study of the relationship between interpersonal facility and placement success. The Social Vocabulary Index consists of six scales: a) the self-concept scale, a 20-item test of opinions of self consisting of statements beginning with "I am..."; responses are chosen from frequency alternatives (most of the time--hardly ever), b) the self-acceptance scale, a 20-item adjective check list, c) the ideal self scale, with the same items as the self-concept scale, except that the statements are stemmed "I would like to be...", d) concept of other scale, also having the same items, but stemmed "Other people are...", e) a vocabulary scale, designed to measure subjects' reading comprehension, and f) a social desirability scale, consisting of 33 statements about personal behavior which the subject is asked to rate true or false for himself.

The Revised Interaction Scale, the other instrument used in this study, is a two-part paper-and-pencil questionnaire that is used by both counselor and counselee to rate the counseling interaction. (University of Utah).

Knowledge of Occupations Test - KOT was designed to measure the extent to which high school students have occupational knowledge. This includes information regarding job descriptions, training, certification and licensing, employment trends, tools, terminology, and earnings, as well as the ability to interpret occupational material. The test contains 96 questions grouped into these eight categories, and takes 40 minutes to complete. (Psychologists and Educators, Inc.).

Mandell NYC Program Interview Forms - These intruments were designed to gather data about job perceptions of Neighborhood Youth Corps enrollees. (Wakoff Research Center).

Minnesota Importance Questionnaire - The MIQ measures psychological needs and values found relevant to work satisfaction. The 20 needs scales include security, compensation, achievement, recognition, authority, creativity and activity, while values scales encompass such items as altruism, autonomy, comfort, safety and status. It is appropriate for individuals age 16 and above. (Vocational Psychology Research).

Missouri Occupational Preference Inventory - MOPI assists clients in exploring career options and understanding reasons behind occupational choices. It is suitable for a wide client population, including college and high school students and employment/training program participants. Total administration time is two hours. (Human Systems Consultants, Inc.).

Mooney Problem Check List - Designed chiefly to identify problems for group discussion or for individual counseling, this checklist drew its items from written statements of problems submitted by about 4,000 high school students. The checklist is available in junior high, high school, college, and adult forms. The problem areas covered vary somewhat from level to level. In the high school and college forms, they include health and physical development; finances, living conditions, and employment; social and recreational activities; social-psychological relations; personal-psychological relations; courtship, sex, and marriage; home and family; morals and religion; adjustment to school work; the future—vocational and educational; and curriculum and teaching procedure. Although the number of items checked in each area can be recorded, the Mooney Problem Check List does not yield trait scores or measures of degree of adjustment. Emphasis is on individual items as self-perceived and self-reported problems or sources of difficulty. (The Psychological Corporation).

My Vocational Situation - This tool provides information about an individual's vocational identity (does the individual have a clear idea of his/her goals, interests, personality and talents?), occupational information (does that person need more information?), and barriers (what external barriers exist that may keep an individual from pursuing his/her particular career choice?). (Consulting Psychologists Press, Inc.).

National Assessment of Educational Progress--Career and Occupational Development Exercises - NAEP developed these exercises to survey the educational attainment of 9, 13, and 17 year-old youth in the areas of career and occupational development. They are objective based episodes and assess career decision making, vocational abilities, skills useful in the world of work, effective work habits, and job related attitudes. (National Assessment of Educational Progress).

New Mexico Career Education Test Series - NMCETS was developed to assess specific learner objectives in the area of career education. It contains the following components: Attitude Toward Work, Career Planning Test, Career Oriented Activities Checklist, Knowledge of Occupations, Job Application Procedures, and Career Development Test (Monitor).

New Mexico Statewide Evaluation Program - This instrument provides data concerning knowledge of the following: a) career planning and decision-making, b) the role that job characteristics and requirements play in the selection of a career, c) applying for a job, and the needed skills and behaviors, and d) basic attitudes, values and responsibilities necessary to maintain a job and advance beyond the entry level of an occupation. (Evaluation, Assessment, and Testing Unit--New Mexico State Department of Education).

Non-Sexist Vocational Card Sort - NSVCS focuses on the exploration of feelings, values, needs, interests, fears, fantasies, life style preferences and the internalized sex, race or class stereotypes which limit the vocational options clients perceive to be open to them. It can be used for high school level clients and takes two hours to administer. (NSVCS).

Occupational Awareness Inventory - OAI was designed to determine an individual's awareness of careers through testing his/her career information knowledge. It is a multiple choice instrument appropriate for junior high level students who have been exposed to a career awareness program. (Evaluative Research Associates, Inc.).

Occupations and Careers Information BOXSCORE - BOXSCORE assesses basic knowledge of occupational information. The questions included in the test involve the following kinds of information: work performed, entry requirements (schooling), licensing requirements, rewards (earnings), and occupational outlook, as well as general information on the world of work. (Chronicle Guidance Publications, Inc.).

Occ-U-Sort - This process was developed to: a) stimulate career exploration, b) facilitate occupational decision-making, c) promote individual thinking about motives for choosing occupations, d) sharpen self-perceptions in the context of meeting career needs, e) broaden career options, and f) provide a framework for understanding the wider world of work. It is appropriate for junior and senior high school students, college students, and adults, and requires approximately one hour to administer. (Publishers Test Service).

Ohio Work Values Inventory - OWVI consists of 77 items that measure eleven significant work values. They include altruism, object orientation, security, control, self-realization, independence, money, task satisfaction, solitude, ideas/data orientation, and prestige. (CTB/McGraw-Hill).

Orientation to Career Concepts Series - OCCS assesses what students know about 10 important aspects of the world of work: a) work awareness, b) worker activities, c) vocational vocabulary, d) occupational incongruities, e) occupational similarities, f) occupational tools, g) ability to relate an individual's interests, abilities, and hobbies to possible occupations, h) working conditions, i) occupational training, and j) worker's earnings. The entire battery requires about three hours to complete. (Evaluative Research Associates).

Personal Reaction Blank - PRB assists personnel officers in selecting new employees. It employs 70 interest and attitude items and yields a single score designed to measure a dependability-consciousness factor among rank and file workers. The instrument normally takes 10-15 minutes to complete. (University of California at Berkeley).

Program for Assessing Youth Employment Skills - PAYES contains a battery of seven tests designed specifically for use with disadvantaged youth. It consists of three separate booklets. Booklet 1 contains three attitudinal measures; Booklet 2, three cognitive ones; and Booklet 3, a vocational interest inventory. Job-holding skills, attitude toward supervision and self-confidence are the three major attitude areas covered. Cognitive measures of job knowledge, job-seeking skills and practical reasoning also are surveyed. The measures are designed for adolescents and young adults with low verbal skills; pictures help to clarify many of the questions presented. The pictures in this "unisex" test battery are designed so that all items are equally appropriate for males and females.

PAYES is administered orally to small groups in an informal manner. (Cambridge Book Company).

Self-Directed Interest Inventory - The purpose of SDII is to obtain information regarding students' activities, occupations, and abilities as they relate to career interests. The five sections of the inventory consist of a) listing the occupations they have considered, b) indicating the activities they like or dislike, c) evaluating the competencies they possess in performing different activities, d) rating occupations they find interesting or not interesting, and e) making self-estimates of their own abilities in different areas. Total time required is approximately 30 minutes. (Research for Better Schools, Inc.).

Self Evaluation and Development Skills - SEDS reveals skill and knowledge in the following aspects of self-understanding, and the extent of awareness of the characteristics and behavior of other people: a) understanding individual differences, b) evaluating individual characteristics and understanding test results, c) changing personal characteristics and behavior, d) locating and interpreting information about self, and e) applying knowledge about self to career opportunities. It takes 60 minutes to complete. (The College Board).

Self Interview Check List - This vocational interest instrument is used with the Cleff Job Matching System. It produces two applicant profiles: one describes activities preference, and the other describes activities experience, arranged according to 16 dimensions of work. Results can then be compared with data on the characteristics of the jobs, organized under the same basic dimensions. (Center for Human Technology).

Standardized Assessment System - The SAS was developed to test the relative effectiveness of a wide variety of youth employment and training programs. The SAS pre and post program battery measures specific work related competencies on the following scales: vocational attitude, job knowledge, job holding skills, work relevant attitudes, job seeking skills, sex stereotyping of adult occupations, and self esteem. The Standardized Assessment System also includes the STEP Locator Reading Test, and rating forms on enrollee behavior to be filled out by counselors, work supervisors, and employers. (Educational Testing Service).

STS Youth Inventory - This instrument is a checklist of needs and problems and is suitable for individuals at the 7th-12th grade levels. Items are grouped under the following categories: "My School," "After High School," "About Myself," "Getting Along With Others," and "Things in General." A helpful device incorporated into STSYI is the use of different sized response boxes to enable the respondent to suggest the magnitude of each problem. (Scholastic Testing Service, Inc.).

Survey, Secondary School Form - This instrument measures knowledge of occupations and educational career relationships, as well as self concept and personal values. (Union County Board of Education--Career Based Curriculum Project).

Tests for Everyday Living - TELs measure knowledge of life skills necessary to successfully perform everyday life tasks, such as shopping, using bank accounts, managing one's personal finances, obtaining and keeping a job, and maintaining one's health. The seven tests are: job search skills, job related behavior, health care, home management, purchasing habits, banking, and budget. (CTB/McGraw-Hill).

Texas Career Education Measurement Series - TCEMS consists of a battery of sixty-three paper-and-pencil instruments and a general survey test. The sixty-three Basic Learner Outcome Tests are designed to measure student development within nine career education categories. These categories are career planning and decision making, career and occupational information, job acquisition and retention, attitudes and appreciation for career success, skills in human relationships for careers, self investigation and evaluation for career success, personal/work/societal responsibilities, economic factors influencing career opportunity, and education/career opportunity relationships. (I(t) Work(s), Inc.).

TSEMG Rating Scales - These short scales were developed for measuring self perception, locus of control, and need for achievement. They were utilized in these related studies designed to investigate relationships between work related characteristics and personality traits. (West Virginia University).

USES Interest Checklist - This interviewing aid is used to obtain information on the range of vocational preferences. It is particularly useful with persons who have no definite work interests or who have limited knowledge of the variety of jobs and occupational fields. The checklist enumerates 173 items that have been keyed to the Worker Trait Arrangement (WTA) and Occupational

Group Arrangement (OGA) of the third edition of the Dictionary of Occupational Titles. (U.S. Government Printing Office).

Vocational Exploration Demonstration Project - VEDP provided an educational and motivational experience through which program participants could: a) learn about the world of work and the labor market, b) become aware of and acquainted with different occupations, jobs and career opportunities, c) gain the knowledge and perspective to help them make decisions about their future, and d) develop a firm behavioral and attitudinal foundation from which to proceed into the realm of employment. The VEDP Year II Benchmark Assessment System was designed to document youth acquisition of entry level competencies in the pre-employment and work maturity areas. The BAS was curriculum referenced and learning objectives based, and encompassed behavioral observation, product review, and experiential episodes as evaluation procedures. (St. Louis University Center for Urban Programs).

Vocational Interest, Experience, and Skill Assessment - VIESA is a self scored inventory of career related interests, experiences, and skills supplemented by an informal ranking of job values. It facilitates self/career exploration on the part of persons in the early stages of educational and vocational planning or replanning. There are two levels: grades 8-10 and grades 11-Adult. VIESA, designed to widen the range of careers usually considered by males and females, can be administered in 45 minutes. (American College Testing Program).

Vocational Planning Inventory - VPI provides individual predictions of success in major vocational curriculum areas by measuring a student's general ability, specific aptitudes, achievement, and values. The resulting test score data are transformed into estimates of the average grades a student would most probably receive in courses in specific vocational curriculum areas as well as in vocational and academic subjects as a whole. BPI consists of separate subtests of: pictorial reasoning, expression, assembly, memory, arithmetic, values, general ability, and mechanics. It requires approximately 3 hours to complete. (Science Research Associates, Inc.)

Work Effectiveness Skills - WES indicates skill and knowledge in the following aspects of working on a job: (a) identifying the responsibilities of employers and employees to each other, (b) developing effective work habits, (c) achieving effective working relationships with co-workers, (d) managing work situations to achieve personal satisfaction, (e) giving and receiving supervision effectively, (f) advancing on the job, and (g) planning job changes. It takes about 60 minutes to complete. (The College Board.).

Work Relevant Attitudes Inventory - WRAI consists of 26 items arranged into three scales: optimism, self confidence, and unsocialized attitudes. It can be used to help diagnose the needs of new program participants. (George Washington University.).

Work Values Inventory - WVI is a self report inventory designed to measure the satisfactions which men and women seek in work, and the satisfactions which may accompany the outcomes of work. Scales include altruism, creativity, aesthetics, intellectual stimulation, independence, achievement, prestige, management, economic returns, security, surroundings, supervisory relations associates, variety, and way of life. Total administration time is 15-25 minutes. (The Riverside Publishing Company - a Houghton Mifflin Subsidiary).

C. BASIC EDUCATIONAL SKILLS ASSESSMENT INSTRUMENTS

Adult Basic Learning Examination - ABLE is a four-part test battery designed to measure educational achievement among adults, primarily those who have not completed formal 12th-grade education. There are three levels of the ABLE. At each level there are tests of vocabulary, reading, spelling, and arithmetic (problem solving and computation). The ABLE Reading Test contains a great variety of content, with heavy emphasis on the everyday life of adults, and is designed to yield a general estimate of literacy. A separate test, called SelectABLE, may be used to determine which level of ABLE is appropriate for a given examinee. Administration of ABLE is not timed, but the Reading test probably would require about 30 minutes to complete for most examinees. (The Psychological Corporation).

Adult Performance Level Program - APL is an objectives based assessment program designed to measure the life skills proficiency of both young and mature adults. Rather than emphasizing purely academic knowledge, the Program focuses on basic tasks that are highly relevant to everyday living. The basis of the APL Program is a two-dimensional model of functional competency that emphasizes the application of fundamental skills to practical situations. The skill dimension of the program includes identification of facts and terms, reading, writing, computation, and problem-solving—all considered important for successful living in our society. The practical situations or content dimensions of the program have been organized into five major areas. These are community resources, occupational knowledge, consumer economics, health, and government and law. These content areas include most of the situations judged to be critical in the daily life of successful adults. (American College Testing Program).

Analysis of Learning Potential - This instrument measures learning potential, and provides two scores—one based on comparisons with examinee's own age group and another based on comparisons with examinee's grade group. It also offers reading and mathematics composite prognostic scores. (Harcourt Brace Jovanovich).

Analysis of Skills: Language Arts - ASLA is an objective-referenced and norm-referenced test measuring skills in capitalization and punctuation, usage, and sentence knowledge/composing process. Each of 36-58 skills are tested by three items, and the results are given as mastery, partial mastery and non-mastery of each skill. The test is available in six levels. Appropriate administration times vary from 60 to 90 minutes. (Scholastic Testing Service, Inc.).

Analysis of Skills: Mathematics - ASM is an objective-referenced and norm-referenced test measuring skills in the following areas: computational skills, concepts, and applications. Skill scores are provided for positive whole numbers, fractions, and decimals, negative integers, computational processes, numbers and numeration systems, properties, and theory, set notation and operation, common measures, metric and nonmetric geometry, percents, statistics and probability, trigonometry, functions and graphs, ratios and proportions, mathematical sentences and algebra, everyday problems, and use of specific concepts. Each skill is tested by three items, and the results are given as mastery, partial mastery, and nonmastery of each skill. Approximate administration times vary from 100-180 minutes, divided among three testing sessions. (Scholastic Testing Service, Inc.).

Analysis of Skills: Reading - ASR is a criterion and norm referenced test measuring skills in the following areas: word analysis, comprehension, and study skills. Test completion time is 135-175 minutes. (Scholastic Testing Service).

Assessment of Skills in Computation - ASC measures junior high school students' ability to handle computational problems typically encountered in school, home, and community situations. The ASC program provides diagnosis of skill strengths and needs and instructional prescriptions to remediation in each area of need. It prepares students for successful performance on competency-based tests for graduation from senior high school. (CTB/McGraw-Hill).

Basic Skills in Arithmetic Test - BSAT assesses an individual's ability to perform forty-three fundamental skills in arithmetical operations involving whole numbers, fractions, decimals, and percentages. Test results can be used in determining group and individual instructional needs. In industrial settings, the results can be used to aid in the selection and placement of personnel in positions which require basic computational skills. (Science Research Associates, Inc.).

California Achievement Tests - CAT measures educational attainment and diagnoses learning difficulties in basic skills. It provides scores in reading (vocabulary and comprehension), arithmetic (reasoning and fundamentals), and language (mechanics and spelling). (CTB/McGraw-Hill).

Comprehensive English Language Test for Speakers of English as a Second Language - CELT is a measure of the English proficiency of persons high school age and above who are learning English as a second language. The listening test is concerned with the comprehension of short statements, questions, and dialogues as spoken by native speakers of English, it is designed for use in programs of English as a second language at the intermediate and advanced levels. (McGraw-Hill Book Company).

Cooperative English Tests - These tests measure achievement in two fundamental areas: reading comprehension and english expression. Reading comprehension is further broken down into vocabulary and reading (level of comprehension and speed of comprehension). English expression also consists of two parts (effectiveness and mechanics). There are three parallel forms of each test. Testing time is 40 minutes per test. (Educational Testing Service).

Comprehensive Tests of Basic Skills - These instruments were designed to measure the basic skills involved in the broad areas of reading (vocabulary, comprehension), language (mechanics, expression, spelling), mathematics (compulation, concepts, applications), reference skills, science, and social studies. The time required to administer the entire battery is 184-268 minutes, depending on the level. (CTB/McGraw-Hill).

Cornell Learning and Study Skills Inventory - This instrument aids in the assessment of factors which are related to learning problems and school performance. The inventory can be used with a sixth grade or higher reading level. (Psychologists and Educators, Inc.).

Diagnostic Mathematics Inventory - DMI can be utilized to a) diagnose strengths and needs in mathematics, b) prescribe relevant learning experiences in mathematics skills, and c) evaluate attainment of specific mathematics objectives after a period of instruction. (CTB/McGraw-Hill).

Diagnostic Reading Scales - DRS's consist of an individually administered series of graduated tests containing three word-recognition lists, 22 reading passages, and eight supplementary phonics tests. The graded word-recognition lists yield a tentative level of performance that is used to determine the examinee's entry level to the reading passages. The reading passages are used to establish three reading levels for the examinee: instructional level (oral reading), independent level (silent reading), and potential level (auditory comprehension). (CTB/McGraw-Hill).

Diagnostic Reading Tests - DRT's comprise three separate batteries designed to cover all grade levels from kindergarten through the freshman year of college. The basic plan of each battery includes a survey section designed to assess general reading proficiency and a number of supplementary diagnostic tests for appraising specific reading skills. The entire battery need not be given to each individual. Teachers may choose tests in those areas in which the individual exhibits special difficulties, as indicated by his performance on the survey tests. (Committee on Diagnostic Reading Tests, Inc.).

Everyday Skills Tests - EDSTs are survival skills tests for junior high schools that measure the skills in reading and mathematics necessary for effective participation in today's complex society. They provide, in a single instrument, criterion-referenced measures of basic competencies as well as norm-referenced data for monitoring achievement in relation to a national sampling of the student population. (CTB/McGraw-Hill).

Fundamental Achievement Series - Designed as an achievement test for people with below average exposure to formal education, FAS is administered by tape-recording and test booklets to adolescents and adults with an ability range from basic literacy to somewhat above the eighth grade. The verbal and numerical sections measure practical achievements, such as reading signs and menus, finding numbers or names in a list, recognizing numbers and correctly spelled words, telling time, using calendars, understanding orally presented information, and solving computational problems of varying difficulty. (The Psychological Corporation).

General Educational Performance Index - GEPI was devised to measure the extent to which adults are ready to attempt the General Educational Development test. The five subtests include writing, reading, mathematics, social studies, and science. Administration time is approximately three hours. Test scores may be useful for grouping for instructional purposes or following progress in test-retest situations. (Steck-Vaughn Company).

Gilliland Learning Potential Examination - GLPE is a measure of intelligence designed specifically for individuals who are either non readers or poor readers, and native and rural Americans. Scores reported include visual memory, symbolic representation, symbol identification, relationships, listening comprehension, picture completion, and general information. (The Reading Clinic—Eastern Montana College).

High School Equivalency Test Guide - This instrument is a test primer for the GED, similar in some aspects to the General Education Performance Index. Subscores are available in the following areas: correctness and effectiveness of expression (spelling, capitalization, punctuation, usage, effectiveness of expression, diction and style), interpretation of reading materials in literature, social studies and general science, and general mathematical ability. (P.A.R., Inc.).

Individual Reading Placement Inventory - IRPI is an individually administered aid in determining the student's independent reading level, frustration level, and present language potential. The Inventory is designed specifically for illiterate and semiliterate adolescents and adults. Subscores are word recognition and analysis, oral paragraph reading, present language potential, auditory discrimination, and letters of the alphabet. After administering the Inventory, the examiner completes the Checklist of Reading Difficulties, a form for recording observations concerning possible posture problems, emotional symptoms, reading rate difficulties, and sight-sound perceptual problems. (Follett Educational Corporation).

Individualized Criterion Referenced Testing: Math - ICRTM consists of eight levels of tests measuring 312 objectives in the following areas: sets, bases/numeration systems, addition and subtraction/whole numbers, place value, equations and inequalities, properties of addition and subtraction, money, time, geometry, fractions, measurement, word problems, multiplication of whole numbers, division of whole numbers, properties of multiplication and division, multiples/prime and compositon, factorization, estimation and rounding, graphs and scale drawings, decimals and percents, exponential notation, ratio and proportion, and operations of rational numbers/integers. (Educational Development Corporation).

Individualized Criterion Referenced Testing: Reading - ICRTR's objectives include letter recognition, phonetic analysis, structured analysis, literal and critical comprehension, and vocabulary. (Educational Development Corporation).

Iowa Tests of Basic Skills - ITBS provides scores on the following scales: vocabulary, reading comprehension, language (spelling, capitalization, punctuation usage), work study skills (graphs, reference materials, tables, maps), and arithmetic skills (concepts, problem solving). Time required for completion is a little over six hours. (Houghton Mifflin).

Iowa Silent Reading Tests - The test appraises vocabulary, reading comprehension, and speed of reading with comprehension. Level 1 (grades 6-9) and Level 2 (grades 9-14) also assess use of reference materials and skimming/scanning for specific information. ISRT provides a reading efficiency index which measures reading speed and accuracy. Testing time is 80 minutes. (Harcourt Brace Jovanovich).

Iowa Tests of Educational Development - ITED measures broad and generalized intellectual skills and abilities. The following items are assessed: understanding of basic social concepts, background in the natural sciences, correctness and appropriateness of expression, ability to think quantitatively, ability to interpret reading materials in social sciences, ability to interpret reading materials in natural sciences, ability to interpret literary materials, general vocabulary, and uses of sources of information. Completion time is two days. (Science Research Associates, Inc.).

IOX Basic Skill Tests - There are three Basic Skills Tests, one each in reading, writing and mathematics. In each of these tests, distinct skills are measured by separate subtests--five in reading (understanding safety warnings, completing forms and applications, using common reference sources, determining main ideas, using documents to take action), four in writing (using words correctly, checking mechanics, selecting correct sentences, expressing ideas in writing), and four in mathematics (performing basic calculations, solving everday problems requiring single arithmetic operations, solving everyday problems requiring formulas, solving everday problems requiring multiple arithmetic operations). (Instructional Objectives Exchange).

Job Corps Diagnostic/Unit Mathematics Tests - The foundation of the Job Corps mathematics program are the Diagnostic/Unit tests. There is a D/UT for each of the 23 units in the program, with five different but equivalent forms for each test. When a D/UT is administered before the students enter a lesson, it is used as a diagnostic test. When a different but equivalent D/UT is used to assess mastery following an assignment in the unit, it is considered a unit test. Corpsmembers take a D/UT to determine if they must complete the corresponding assignment. Students who score 80 percent or higher on the diagnostic test may by-pass the assignment and proceed to the next unit's diagnostic test. (Job Corps).

Job Corps Mathematics Skills Inventory (MJSI) - Students are placed into the Job Corps mathematics program on the basis of their score on this instrument. The rating achieved on the MJSI slots students into one of four more precise screening tests. (Job Corps).

Job Corps MJSII Skills Inventory - The MJSII Should be given to all students who score 0-60 on the Job Corps Mathematics Skills Inventory (MJSI). Although there is no exact time limit for the MJSII, Corpsmembers should not be allowed more than 45 minutes to complete the test. (Job Corps).

Job Corps Reading Placement Test #1 (JCRP1) - The Job Corps Reading Placement Test #1 (JCRP1) is used to place students more precisely in a reading level. It is a compilation of the most valid items from tests which were formerly used in Job Corps. The items were revalidated on a large sample of Job Corps students in February, 1979. The test contains 64 items and takes exactly 35 minutes. (Job Corps).

Job Corps Reading Screening Test #1 (RJS1) - The Job Corps Reading Screening Test #1 (RJS1) provides an indication of the approximate level at which a corpsmember will enter the reading program. More precise placement will then be made by the Job Corps Reading Placement Test (JCRP1). The RJS1 will be administered to all corpsmembers. The time limit for completing the RJS1 is thirteen minutes. This time limit must be strictly observed. There are 27 questions on the RJS1. However, only 25 questions (3 to 27) are scored because questions one and two are samples. (Job Corps).

Leiter International Performance Scale - LIPS is an individually administered, non-verbal intelligence test which is appropriate for persons with speech and auditory handicaps, illiterates, the foreign born, and the educationally and culturally deprived. The test consists of a series of subtests which require matching, ranging from the pairing of like colors and objects to more complex relationships of designs and analogies. (Stoelting Company).

Metropolitan Achievement Tests--Reading Comprehension Test - MAT is a battery of norm-referenced and criterion-referenced achievement tests designed for use with individuals through 12th grade level. The RCT is one element of this battery, and was designed to yield an instructional reading level for each pupil. MAT-RCT has an administration time of 40 minutes. (The Psychological Corporation)

Minimum Essentials Test - MET measures student achievement in reading, language, and mathematics, and provides information on the student's ability to apply basic skills to life situations. An optional writing test is included. The 124-item test requires about one and one-half hours to administer. The reading section covers literal comprehension, inferential comprehension, context clues, and main idea. The language section assesses knowledge in punctuation, capitalization, and sentence structure. The mathematics test covers basic arithmetic operation for whole numbers, fractions, decimals and percents. The life skills section tests the application of those skills in communication, finance, government and law, health, safety and nutrition, transportation, and occupations. (Scott, Foresman and Company).

Nelson-Denny Reading Test - This instrument assesses vocabulary, reading comprehension, and reading rate. It requires 30 minutes for completion. (Houghton-Mifflin Co.).

Otis-Lennon Mental Ability Test - This instrument measures verbal conceptualization, quantitative reasoning, general information, and ability to follow directions. It requires about 25-30 minutes to complete. (Harcourt, Brace & World, Inc.).

Performance Assessment in Reading - PAIR provides identification of learner needs in basic reading skills, and instructional prescriptions referenced to these skills. The 72-item test is divided into two sections for administration: reading enabling skills and life role applications. Each section requires approximately 50 minutes to complete. Reading subtests include vocabulary, literal comprehension, critical comprehension, and location/study skills. Life role applications include pictorial representation, reference, forms and documents and rules and regulations. Local programs set the standards of mastery. (CTB/McGraw-Hill).

RBH Basic Reading and Word Test - This instrument was designed to aid in establishing minimum reading skills or literacy by measuring reading vocabulary and comprehension. The test, which covers a broad reading and vocabulary range, is recommended for use in situations where a quick measure of reading level is necessary. (Richardson, Bellows, Henry and Company, Inc.).

Senior High Assessment of Reading Performance - SHARP is a proficiency test that measures competencies in reading skills that are necessary for everyday life. SHARP is designed to be used as an outcome measure of a competency-based education program that emphasizes the student's ability to apply basic reading skills in the life-role situations. SHARP can be used to demonstrate to the schools and to the community that students have mastered the essential reading skills necessary for effective functioning as adults. (CTB/McGraw-Hill).

Sequential Tests of Educational Progress - These tests are available in four levels, suitable for grades 4-6, 7-9, 10-12, and 13-14. Each level contains six multiple-choice tests: reading comprehension, writing, mathematics, science, social studies, and listening comprehension. All tests are available in two parallel forms and are published in separate booklets that may be obtained individually. Each of the six tests requires 70 minutes and can be administered in a single session or in two 35-minute sessions. (Educational Testing Service).

Short Form Test of Academic Aptitude - SFTAA yields language and non-language scores, and consists of four subtests, including vocabulary, analogies, sequences, and memory. The five levels of the test span grades 1.5-12. Testing time is 31-38 minutes. (CTB/McGraw-Hill).

SRA Non Verbal Form - This instrument measures reasoning and concept formation independently of language and reading skills. Items consist of a series of drawings of people, objects or geometric forms, four of which are related. The examinee is required to discover the interrelating principle and indicate the drawing in each series that is most different. The test is recommended for use in screening individuals who have difficulty with reading or language or in screening for jobs in which reading and communication skills have little relationship to successful performance. (Science Research Associates, Inc.).

SRA Pictorial Reading Test - This test measures reasoning and concept formation which is relatively independent of language and reading skills. Items consist of five drawings or pictures, four of which are related. The examinee must discover the interrelating principle. The test is appropriate for selection and placement. It is especially useful with persons who have language or reading difficulties. Recommended usage is in the selection of applicants for jobs in which writing and communication skills contribute little to successful performance. The test can also be used by companies and agencies participating in retraining programs for displaced adult workers or school dropouts in order to identify persons most likely to benefit from the program. (Science Research Associates, Inc.).

Stanford Achievement Test - The elementary school portion of this battery, comprising four levels that span grades 1 to 9, yields scores in reading, language arts (chiefly spelling and language usage), arithmetic (computation, concepts, and applications), social studies, and science. The basic high school battery includes tests in English, numerical competence, mathematics, reading, science, social studies, and spelling. Additional high school tests are available in arts and humanities, business and economics, and technical comprehension in industrial arts. (Harcourt, Brace & World).

Stanford Test of Academic Skills - Each level of the TASK battery contains three subtests: reading, English and mathematics. Testing time is 80 minutes. (Harcourt Brace Jovanovich).

Stanford-Binet Intelligence Scale - This test covers an age range from two years to adult. It is individually administered, with items grouped by age levels. At preschool levels, items stress the ability to follow directions, identification of common objects and parts of the body, memory, and sensory-motor and perceptual skills. By about age six the emphasis shifts to verbal skills (e.g., vocabulary, analogies, similarities and differences), perceptual and verbal discriminations, and simple quantitative skills. At older ages, the item content becomes more verbal and more abstract. On the whole, the test is heavily weighted with verbal material, with quantitative skills playing a relative minor role. (Houghton Mifflin).

Steck-Vaughn Placement Survey for Adult Basic Education - This instrument is designed to assess skills from a nonreading level through 8th grade. Skills are assessed in the areas of reading, language, and mathematics and include phonics, vocabulary, comprehension, capitalization, punctuation, spelling, English usage, money, word problems, and operations with whole numbers. Test administration time is approximately 15 minutes for each section, or 45 minutes for the entire survey. A word list is used as an initial screening device to prevent learners from experiencing excessive frustration when taking certain parts of this survey. (Steck-Vaughn Company).

Sullivan Associates Programmed Reading System - SAPRS is the basis for instruction in the Job Corps beginning reading program. Placement into the Sullivan materials is determined by administering the Sullivan Placement Examination, a series of 16 short tests. (Job Corps).

Test of Adult Basic Education - TABE provides information about a student's level of achievement in the basic skills of reading, mathematics and language. It analyzes the needs of adults and out of school youth who wish to undertake vocational-technical training, general literacy, or self improvement study. There are three forms of TABE—easy, medium, and difficult. A locator test determines which level is appropriate for a participant. Test administration time ranges from 90 minutes for easy to 150 minutes for difficult. (CTB/McGraw-Hill).

Test of Everyday Writing Skills - TEWS is a competency test in writing or composition skills that assesses the application of these skills to everyday life situations. It measures virtually all aspects of writing that students need to perform as adults, including mechanics, spelling and punctuation, usage, and sentence and paragraph construction. (CTB/McGraw-Hill).

Tests of General Ability - TOGA is a nonverbal, pictorial measure of intelligence designed to be independent of reading, arithmetic, and other scholastic tasks. The test takes about 45 minutes and has a range from kindergarten through grade 12. Like many other nonverbal measures, TOGA is especially aimed toward children from culturally deprived backgrounds. An examinee's score on Part I of the test is a measure of the information, vocabulary, and concepts that he has acquired. The score on Part II is a measure of noncultural reasoning ability, and the total score is an overall, nonverbal measure of general intelligence. (Science Research Associates, Inc.).

Tests of General Educational Development - The GED was specifically designed to measure the educational achievements of people who have not graduated from high school. It assesses broad intellectual abilities and skills that do not depend on specific subject matter courses. Scores on the GED are used as the criteria for granting high school equivalency certificates. GED scores can also be used to gain admission to licensing examinations for professions which require the completion of the ninth, tenth, or eleventh grades. The tests included in the GED battery are correctness and effectiveness of expression, interpretation of reading materials in the natural sciences, interpretation of reading materials in the social studies, interpretation of literary materials, and general mathematical ability. (American Council on Education).

USES Basic Occupational Literacy Test - BOLT assesses basic reading and arithmetic skills of school dropouts for referral to occupational training or remedial education. The scores reported are: a) reading vocabulary, b) reading comprehension, c) arithmetic computation, and d) arithmetic reasoning. The instrument is essentially self administering and requires about one hour to complete. (U.S. Government Printing Office).

Wide Range Achievement Test - WRAT is an individual test for clinical use, indicating level of skill in oral reading, spelling and arithmetic computation. The examiner adjusts the testing range to the achievement level (kindergarten through college) of the individual. This is used in remedial and vocational studies of children and adults. The test time is fifteen to thirty minutes. (The Psychological Corporation).

Word and Number Assessment Inventory - WNAI measures verbal and mathematical abilities and then compares these scores with those of various educational and occupational groups at similar skill levels. It provides career information relevant to the scores and offers suggestions for improving word and number skills. The instrument is appropriate for persons at the 9th-12th grade levels, as well as adults. (NCS Interpretive Scoring Systems).

D. JOB SPECIFIC SKILLS ASSESSMENT INSTRUMENTS

Appraisal of Occupational Aptitudes - AOA consists of eight sub-tests: checking letters, checking numbers, filing names, filing numbers, posting names, posting numbers, arithmetic computation and reasoning, and using desk calculators. It is intended for selection and counseling regarding business and office careers. (The Psychological Corporation).

APTICOM - This computer based assessment tool consists of a desk top unit on which the examinee attempts to complete a number of tasks involving cognitive and manipulative abilities. APTICOM produces an aptitude profile, and requires about 90 minutes to administer. (Vocational Research Institutes - Jewish Employment and Vocational Service).

Aptitude Tests for Occupations - The tests provide useful information on individual aptitudes related to specific occupations and careers. They are for use with high school students, college students, and adults. The full battery is composed of six instruments which measure the following aptitudes: a) personal-social, b) mechanical, c) general sales, d) clerical routine, e) compulation, and f) scientific. Total completion time is 1 hour and 47 minutes. (PRO-ED).

Bennet Hand-Tool Dexterity Test - The Bennett Test measures manual dexterity and gross motor coordination. The subject is required to remove twelve bolts from one vertical board and replace them on another. Four tools are used in the task, two open end wrenches, one adjustable wrench, and one screwdriver. (The Psychological Corporation).

Bennet Mechanical Comprehension Test - BMCT measures the ability to perceive and understand the relationship of physical forces and mechanical elements in practical situations important for a wide variety of jobs, for engineering, and for many trade school courses. A high score on this trait indicates an ability to readily learn the principles of operation and repair of complex devices, and helps in the screening and selection of persons for occupations requiring mechanical aptitudes. The test requires 30 minutes to complete. (The Psychological Corporation).

California Ability Placement Survey - CAPS is designed to measure abilities keyed to entry requirements for the majority of jobs in fourteen occupational clusters. It is usable as a separate standardized battery or as a component of the California Occupational Preference System. The instrument is appropriate for individuals at the 7th-12th grade levels, and requires 50 minutes for completion. (Educational and Industrial Testing Service).

California Occupational Preference System - COPS furnishes job activity interests scores and relates those scores to curriculum choice and career preference. The COPS Interest Inventory has scales that assess interest areas including science, consumer economics, outdoors, business, clerical, communications, arts, service and technology. Total administration time is 35 to 55 minutes, including self-scoring. (Educational and Industrial Testing Service).

Card Punch Operator Aptitude Test - The instrument was developed for trainee selection. There are two separately timed parts - an 80 item letter-digit substitution subtest and a 150 item name-checking subtest. The two are combined for a single total score. (International Business Machines Corporation).

Clerical Skills Series - CSS reports scores on skills appropriate to clerical occupations. Scores include areas such as: alphabetizing-filing, clerical speed and accuracy, grammar and punctuation, and vocabulary. (Martin M. Bruce Publishers).

Comprehensive Career Assessment Scale - CCAS yields familiarity and interest scores for 15 areas (such as business and office, construction, manufacturing and public service). It can be utilized for needs assessment, curriculum planning, and/or evaluation. (Learning Concepts).

Computer Programmer Aptitude Battery - CPAB is widely used for selecting applicants for computer training or employment. It provides scores on verbal meaning, reasoning, letter series, number ability, and diagramming, and takes 90 minutes to complete. (Science Research Associates, Inc.).

Crawford Small Parts Dexterity Test - The Crawford measures eye-hand coordination and fine finger dexterity. The first part requires the use of tweezers to place small pins in holes one at a time and then place a collar over it. Part two consists of starting screws in holes using the fingers and then using a small screwdriver to screw them down. (The Psychological Corporation).

Dental Hygiene Aptitude Testing Program - Developed to screen and select dental hygiene school applicants, DHATP provides scores on four scales, including numerical ability, study-reading, science, and general information. It takes 155 minutes to complete. (The Psychological Corporation).

Electrical Sophistication Test - This instrument separates persons with substantial knowledge of electricity from those with no, little and merely chance knowledge. It screens candidates for a wide variety of jobs and positions in which electrical knowledge is important to competent performance. The test is multiple choice and consists of 14 items. There is no time limit, but many candidates finish within five minutes. (Psychometric Affiliates).

Entrance Examination for Schools of Nursing - This instrument is used in screening and selecting nursing school applicants. It provides 7 ability scores (verbal, numerical, science, reading comprehension, arithmetic processes, general information and scholastic aptitude) and 6 personality scores (achievement, orderliness, persistence, congeniality, altruism, and respectfulness). EESN takes 210 minutes to complete. (The Psychological Corporation).

Entrance Examination for Schools of Practical Nursing - EESPN is used to screen and select practical nursing school applicants. It provides 5 ability scores (verbal, numerical, science, reading, and arithmetic fundamentals) and 6 personality scores (achievement, orderliness, persistence, congeniality, altruism, and respectfulness). Completion time is 210 minutes. (The Psychological Corporation).

Flanagan Aptitude Classification Tests - FACT consists of a battery of fourteen tests. Scores are reported for areas such as memory, precision, coordination, tables, planning, ingenuity, mechanics and assembly. The instrument relates to 30 occupations, mainly ranging from skilled to professional. (Science Research Associates, Inc.).

General Clerical Test - GCT is a group administered paper-and-pencil test designed to measure aptitudes which are of importance in clerical work of all kinds. The following subtests are included: a) checking-comparing names, addresses, and amounts and picking out the differences, b) alphabetizing - recording the number of a file drawer for names, c) arithmetic computation, d) error locattion - using addition and subtraction to find the error in a matrix, e) arithmetic reasoning - reading problems, f) spelling - finding and correctly spelling words, g) reading comprehension - answering questions about two paragraphs, h) vocabulary - selecting the word that means the same, and i) grammar - finding and correcting the error in a sentence. Total administration time is 50-55 minutes. (The Psychological Corporation).

Gordon Occupational Checklist - GOC reports 5 scores (business, outdoor, arts, technology, service) and 30 smaller interest clusters. Content covers 240 jobs not requiring college training. Total administration time is 20-25 minutes. (The Psychological Corporation).

IBM Aptitude Test for Programmer Personnel - Designed for use in screening and selecting applicants for computer programmer training, this instrument provides scores on letter series, figure series, and arithmetical reasoning. It takes 65 minutes to complete. (International Business Machines Corporation).

Individual Career Exploration - ICE provides an inventory of interests, experience, occupational choices and abilities in 8 occupations groups: service, business contact, organization, technology, outdoor, science, general culture, arts and entertainment. It contains picture and verbal forms, and reports five scores: first two occupational choices, decision level and two most important job values. (Scholastic Testing Service).

Jewish Employment Vocational Service Work Sample System - JEVS work sample vocational assessment gives descriptive evaluation and quantitative results on client occupational aptitudes, behavior and expressed interest. It has 28 work samples that are associated with 10 Worker Trait group arrangements in the Dictionary of Occupational Titles (DOT), 3rd ed. and with 12 work groups of three work areas in the DOT, 4th ed.. JEVS was designed for economically disadvantaged, unemployed/underemployed youth and adults and requires 5 to 7 six hour days to complete. Scores are provided on: nut, bolt and washer assembly; rubber stamping; washer threading; budget book assembly; sign making; tile sorting; nut packing; collating leather samples; grommet assembly; union assembly; belt assembly; ladder assembly; metal square fabrication; hardware assembly; telephone assembly; lock assembly; filing by numbers; proofreading; filing by letters; nail and screw sorting; adding machine; payroll computation; computing postage; resistor reading; pipe assembly; blouse making; vest making; and condensing principle. (Vocational Research Institute - Jewish Employment and Vocational Services).

MacQuarrie Test for Mechanical Ability - The MacQuarrie contains seven subtests. The first three - Tracing, Tapping, and Dotting - measure eye-hand coordination and finger dexterity. The last four - Copying, Location, Block Counting, and Pursuit - place more emphasis on reasoning about objects in a plane and in space. The test takes about 20 minutes to administer, and has been used in selecting inspectors, assemblers, draftsmen, blueprint readers, power sewing machine operators, machinists, and tool and die designers, among other skilled tradesmen. (CTB/McGraw-Hill).

Manipulative Aptitude Test - MMA measures eye-hand coordination and manual dexterity. It involves two basic tasks (one using the preferred hand and one using both hands) which require movement of hands, arms, and fingers in thrusting and twisting motions. A rectangular plexiglass board with sockets and a T-bar are used. (Western Psychological Services).

Mechanical Handyman Test - This instrument is used to screen and select maintenance workers, and takes 130 minutes to complete. (Public Personnel Association).

Micro-Tower - This is a group aptitude for special needs populations that contains 13 work samples: electronic connector assembly, bottle capping and packing, lamp assembly, blueprint reading, graphic illustration, filing, mail sorting, zip coding, recording, checking, making change, payroll computation, want ad comprehension, and message taking. (Institute for Crippled and Disabled).

Minnesota Clerical Test - MCT is a test of speed and accuracy in performing tasks related to clerical work. The test consists of two parts: number checking and name checking. The subject identifies whether the 100 numbers and 100 name parts are identical or dissimilar. (The Psychological Corporation).

Minnesota Rate of Manipulation Test, 1969 Edition - MRM is designed to assess arm-hand dexterity. This test consists of a formboard with 60 round holes and 60 cylinders which are placed into the holes. There are five subtests, each requiring a different manipulative activity, i.e., placing, turning, displacing, and one-hand and two-hand turning. There are norms and instructions for the blind. (American Guidance Service, Inc.).

Minnesota Spatial Relations Test - MSRT consists of four parts. Each part requires the transfer of 58 blocks of assorted sizes and shapes from one board to another. Each block will fit only one hole in the board. (American Guidance Service, Inc.).

National Institute for Automatic Service Excellence Automotive Mechanic Testing and Certification Program - NIASE offers a testing and certification program to automotive mechanics. Twice yearly, in over 270 locations nationwide, the Institute gives a series of written tests which measure diagnostic and repair skills.

When an automotive technician passes one or more of these tests, and meets the two-year experience requirement, he or she earns the right to wear the NIASE patch. Since the NIASE program began in 1972, nearly a quarter of a million pros have passed tests and earned their certificates. Certified mechanics are leaders in the drive for excellence in automotive repair. NIASE tests mechanics in eight automobile, six heavy-duty truck, and two body/paint specialty areas. Auto tests are: engine repair, automatic transmission/transaxle, manual drive train and axles, front end, brakes, electrical systems, heating and air conditioning, and engine performance. Body repair and painting/refinishing tests also are offered.

Each test is made up of between 40 and 80 multiple-choice questions, written by automotive experts from all parts of the industry. All questions are quality-checked by a panel of technical service representatives from domestic and import vehicle manufacturers, repair and test equipment manufacturers, and parts manufacturers, plus working mechanics and vocational educators. Tests are administered under strict security conditions, with the questions changed each time the test is given. (National Institute for Automotive Service Excellence).

N.I.I.P. Engineering Apprentice Selection Test Battery - This instrument is used to screen and select engineering apprentices. It measures spatial perception, nonverbal intelligence, arithmetic attainment, mechanical ability and information, and takes 180 minutes to complete. (National Institute of Industrial Psychology).

NLN Aide Selection Test - This instrument is used to screen and select applicants for aide positions in hospitals and home health agencies. It requires 35 minutes for completion. (National League for Nursing, Inc.).

O'Connor Finger Dexterity Test - This test was designed to assess motor coordination and finger and manual dexterity. Using a plate with 100 holes arranged in ten rows, the subject inserts small metal pins in each of the holes, in groups of three, as rapidly as possible. (Stoelting Company).

Ohio Trade and Industrial Education Achievement Tests - Tests are administered annually at participating schools. Each student must take two tests - the intelligence test and a trade achievement test. The 16 trade tests are in areas such as auto body, auto mechanics, basic electricity and electronics, cosmetology, dental assisting, health occupations, industrial electronics, machine trades, mechanical drafting, printing, sheet metal, and welding. (Instructional Materials Laboratory - Ohio State University).

Pennsylvania Bi-Manual Worksample - PBW measures hand and finger dexterity. The first part (assembly) requires manually assembling bolts and nuts and then placing them in a hole in the board. The second part (disassembly) requires removing the assemblies from the hole, taking them apart and returning the parts to their bins. (American Guidance Service, Inc.).

Purdue Pegboard - The Purdue Pegboard measures manual dexterity using a pegboard that contains two rows of 25 holes into which pins are inserted using the right hand, and both hands; then pins, washers, and collars are assembled using both hands. (Science Research Associates, Inc.).

Purdue Personnel Tests - PPT's measure job related technical information. They include, among others, trade tests for such occupations as carpentry, welding, sheet metal work, and engine lathe operation. (University Bookstore - Purdue University).

Purdue Test for Electricians - PTE was designed to aid industry and vocational schools in determining the amount of knowledge of electricity and electrical operations possessed by applicants or students. (Science Research Associates, Inc.).

RBH Industrial Questionnaire - This is a measure of general ability designed for use in the screening of basic blue collar employees, unskilled laborers and routine factory workers, operatives and craftsmen, and others involved in the electric utility, paper, ore, and chemical industries. Items cover reading comprehension, arithmetic reasoning, and chemical comprehension. The publisher states that the absence of a formal time limit makes the test useful in borderline cases where limited education or limited knowledge of the English language handicaps otherwise desirable applicants. (Richardson, Bellows, Henry and Company, Inc.).

RBH Non-Verbal Reasoning Test - Long Form - This instrument is a non-verbal and non-language test designed for use in batteries for the screening of technicians, engineers, engineering aids, technical salesmen, and any population for whom language presents a problem. The examinee must be able to read numbers in order to be tested since he must identify the illustrations and record his answers. The test measures reasoning and concept formation through the use of symbols and geometric figures. Some of the items are concerned with concepts such as: tangents, angle bisection, vertical-horizontal arrangement, and squareness. (Richardson, Bellows, Henry and Company, Inc.).

RBH Non-Verbal Reasoning Test - Short Form - This test measures reasoning and concept formulation through the use of symbols and geometric figures. It is non-verbal and non-language, and is appropriate for use in the selection of operatives and craftsmen, basic blue collar and unskilled labor positions, routine factory personnel, and any population for which language is a problem. (Richardson, Bellows, Henry and Company, Inc.).

The Self-Directed Search - SDS is a self-adminstered, self-scored, and self-interpreted tool that evaluates work related interests and abilities. It provides measures on six occupational scales - realistic, investigative, artistic, social, enterprising and conventional, and takes between 45-60 minutes. (Consulting Psychologists Press, Inc.).

Short Occupational Knowledge Tests - SOKT's measure knowledge of current content and concepts in each field, and are used by employers to differentiate between knowledgeable applicants and those having a limited understanding of the job. Tests are for the following occupations: auto mechanics, bookkeepers, carpenters, drafters, electricians, machinists, office machine operators, plumbers, secretaries, tool and die makers, truck drivers and welders. (Science Research Associats, Inc.).

Short Test of Clerical Ability - This instrument measures seven areas: arithmetic, business vocabulary, checking, coding, directions - oral and written, filing, and language. The test can be used for job placement purposes, and is intended for use with office positions. (Science Research Associates, Inc.).

Singer Vocational Evaluation System - SVES provides both vocational assessment and occupational exploration and identifies abilities, interests and work tolerances for vocational training. It consists of a series of 24 work sampling stations which represent the most common jobs found in the Dictionary of Occupational Titles (DOT). SVES measures client proficiencies in the following job areas: sample making, bench assembly, drafting, electrical wiring, plumbing and pipefitting, carpentry, refrigeration-heating-air conditioning, soldering-welding, office and sales clerk, needle trades, masonry, sheet metal, cooking and baking, engine service, medical service, cosmetology, data calculation and recording, soil testing, photo lab tehnician, and production machine operating. (The Singer Company).

SRA Mechanical Aptitudes - This is a group administered, multiple choice paper and pencil test. It contains three sections: a) mechanical knowledge - 45 pictures of commonly used tools and implements are identified and/or their use is given, b) space relations - 40 figures cut into two or three pieces which are mentally formed into a whole, and c) shop arithmetic - 124 problems, most of which are based on drawings. (Science Research Associates, Inc.).

SRA Test of Mechanical Concepts - This test reports four scores: mechanical interrelationships, mechanical tools and devices, spatial relations, and total. It may be used to evaluate individuals for hire, promotion, or training for jobs like assembler, machinist, factory production worker, or maintenance mechanic. (Science Research Associates, Inc.).

Stromberg Dexterity Test - SDT is designed to aid in choosing workers for jobs requiring speed and accuracy of arm and hand movement. It consists of 54 red, blue and yellow discs and a durable board containing 54 holes on one side. The subject is scored on the amount of time it takes to complete the task. (The Psychological Corporation).

Student Occupational Competency Achievement Tests - SOCAT consists of two parts - written and performance. The written test, which has a multiple choice format, covers factual knowledge, technical information, understanding of principles, and problem-solving abilities related to a particular occupation. The performance test, which is administered in a laboratory, school shop, or clinical setting, consists of work assignments designed to sample the manipulative skills required in an occupation. SOCATs enable students to demonstrate that they possess the knowledge that competent craftspersons employ in their daily work. In addition, a mental aptitude test is available for administration at the same time as the competency test. Thus, a one page printout can be provided for each student which indicates mental aptitude along with written and performance scores on the competency test. Any teacher, guidance counselor or test administrator can administer the aptitude test and the written multiple choice achievement test. A journeyman tradesperson or business representative with technical expertise in the occupation should administer the performance test.

Presently SOCATs are available in the following fields: accounting/bookkeeping, agriculture mechanics, auto body, auto mechanics, construction electricity, drafting, general merchandising, general office, heating and air conditioning, horticulture, industrial electronics, machine trades, practical nursing, printing, radio and TV repair, refrigerator, sewn products, small engine repair, and welding. Tests will soon be available in eleven additional occupations, including banking, savings and loan, cabinetmaking, carpentry, commercial foods, computer programming, construction masonry, industrial electricity, medical assisting, plumbing, production agriculture, truck and bus mechanics.

SOCATs were designed to measure end of program accomplishment, and are a key to competency-based vocational education. Students will be able to demonstrate their competence on a national test and use the test results as a credential for employment or advanced standing in educational programs. SOCAT results will also enable employers to hire individuals on the basis of demonstrated levels of competence, as opposed to letter grades, which lack definition. (National Occupational Competency Testing Institute).

Talent Assessment Program - TAP is a battery of ten instruments which measure dexterity, visual and tactile discrimination, and memory as they relate to the functional level of career related attributes and worker trait factors. This identification of vocational aptitudes facilitates training program assignment and job placement. Scores are provided on visualizing structural detail, sorting - size and shape, sorting - color, sorting by touch, handling small materials, handling large materials, using small tools, using large tools, visualizing flow paths, and memory for structural detail. TAP's appropriate for individuals age 13 and over who are at the 8th grade level. Total administration time is 160 minutes. (Talent Assessment, Inc.).

System Approach to Vocational Evaluation - SAVE provides an organizing framework for work-sample type vocational evaluation of disadvantaged and disabled clients. Most needed materials will already exist in schools, evaluation facilities, or industrial arts classes. The SAVE package was developed primarily to provide a way to obtain vocational evaluation information organized according to 47 worker trait groups within the Dictionary of Occupational Titles (DOT). The SAVE approach is unique in that commercially available work samples can be substituted for many of its components, and thus SAVE can be used as a structure for setting up a vocational evaluation work sample system in a variety of formats. (SAVE Enterprises).

Test of Retail Sales Insight - TRSI is a measure of knowledge of selling and sales transactions which can be administered to persons whose reading level is grade six or higher. The test can be administered orally to individuals whose reading level is questionable or below grade six. Subscores are: general sales knowledge, customer motivation and need, merchandise procurement and adaptation, sales promotion procedures, and sales closure. (Psychologists and Educators, Inc.).

TOWER (Testing, Orientation and Work Evaluation in Rehabilitation - TOWER is used to appraise the vocational potential of disabled persons. In includes fourteen broad areas of work evaluation: clerical, drafting, drawing, electronics assembly, jewelry, leather-goods, lettering, machine shop, mail clerk, optical mechanics, pentograph engraving, sewing, workshop assembling, and welding. (Institute for Crippled and Disabled).

USES Clerical Skills Tests - The six clerical tests developed by the United States Employment Service measure skills important in a variety of clerical occupations. The skills measured include typing from plain copy, ability to take dictation, general spelling, statistical typing, medical spelling, and legal spelling. (U.S. Government Printing Office).

USES General Aptitude Test Battery - The GATB, developed by the United States Employment Service was designed on the basis of job analyses and a factor analysis of 59 tests, and is composed of eight paper-and-pencil and four apparatus tests. These 12 tests in combination yield scores on nine factors: Intelligence (G), Verbal Aptitude (V), Numerical Aptitude (N), Spatial Aptitude (S), Form Perception (P), Clerical Perception (Q), Motor Coordination (K), Finger Dexterity (F), and Manual Dexterity (M). Raw scores on the nine factors are converted to percentile ranks or standard scores having a mean of 100 and a standard deviation of 20. The standard scores of an examinee can then be compared with those of the 36 or so occupational aptitude patterns (OAP's) determined from an analysis of the GATB scores of people in over 800 jobs. An OAP consists of minimum scores (cutting scores) on the tests that are considered essential for effective performance in that occupation. The entire GATB takes 2 1/2 hours to administer, and is appropriate for senior high students (usually twelfth graders) and adults. (U.S. Government Printing Office).

USES GATB-NATB Screening Device - The United States Employment Service designed this instrument to help determine whether clients should take the General Aptitude Test Battery or the Nonreading Aptitude Test Battery. (U.S. Government Printing Office).

USES Specific Aptitude Test Batteries - SATBs consist of combinations of two, three, or four GATB aptitudes with associated cutting scores. More than 450 of these have been developed by the United States Employment Service for use in selecting untrained or inexperienced applicants for referral to specific jobs or occupational training. (U.S. Government Printing Office).

VALPAR Component Work Sample System - VALPAR Work Samples assess vocational and functional skills designed to be used in conjunction with other testing instruments. They provide both the measures and clinical observations required for job placement, selection of training programs, and the development of educational plans. Scores are furnished on - small tools; size discrimination; numerical sorting; upper extremity range of body motion; clerical comprehension and aptitude; independent problem solving; multi-level sorting; simulated assembly; whole range of body motion; tri-level measurement; eye-hand-foot coordination; soldering and inspection (electronics); money handling; integrated peer performance; electrical circuitry and print reading; and drafting. VALPAR work samples can be used with almost any population, and require no reading except on items where the job would require it. Time varies from 10 minutes to 6 hours per work sample. (Valpar Corporation).

Vocational Competency Measures Project - Between October 1979 and December 1982, the American Institutes for Research was engaged in a nationwide effort to develop, field test, and validate 17 occupational competency tests under the sponsorship of the U. S. Department of Education. The project promoted the acceptance of student competency testing in vocational education and helped stimulate the continuing development of occupational competency tests.

After extensive interaction with many leaders in vocational education, the following occupations were selectd for the development of competency tests including cognitive, affective and performance elements:

Agriculture - Agricultural Chemicals Applications Technician, Farm Equipment Mechanic
Business and Office - Computer Operator, Word Processing Specialist
Distributive Education - Apparel Sales, Fabric Sales, Grocery Clerk, Hotel/Motel Front Office
Health - Dental Assistant, Physical Therapist Assistant
Home Economics - Custom Sewing, Restaurant Service (Waiter, Waitress, Cashier)
Technical - Electronics Technician, Water Treatment Technician, Wastewater Treatment Technician
Trade and Industry - Carpenter, Diesel Mechanic

The competency tests are intended to serve two major purposes: a) to help teachers and administrators of secondary and postsecoudary vocational education programs evaluate and improve specific areas of their vocational programs, and b) to provide an objective basis for informing students, teachers, and prospective employers about the progress made by students in acquiring specific, job-related competencies. Employers may also find the tests useful for helping in selecting new employees and assessing objectively the training needs of present employees.

Each test package includes the following items:

- paper-and-pencil test - two parts, each part requiring no longer than one class period to administer
- a complete set of the "hands-on" performance tests for that occupation, each test containing examiner and examinee instructions, appropriate test props, and a test record sheet; the number of performance tests in each package ranges from 4 to 13
- Work Habits Inventory, for use as a teaching and counseling tool in job survival skills, and
- an Examiner's Manual, including directions for test administration, a summary of how the tests were developed, technical data on test reliability and validity, and scoring keys for the tests and the Work Habits Inventory.

AIR has established the usefulness of these instruments through extensive field testing and evaluation. (American Institute for Research).

Vocational Information and Evaluation Work Samples - VIEWS was specifically designed for the evaluation of mentally retarded persons. its 16 work samples are from four fields of work and assess client performance on six Worker Trait Group Arrangements appropriate to jobs which may be held by mentally retarded individuals. VIEWS evaluates occupational potential and work related behaviors for formulating Individual Education Plans (IEPs) and for recommending training, placement, and work adjustment programs. The total process encompasses 5 six hour days. Scores are provided on - tile sorting; nuts, bolts and washer sorting; paper count, cutting, collating and stapling;

stamping; nuts, bolts and washer assembly; screen assembly; machine feeding; mail sort; mail count; nut weighing; valve disassembly; drill press; budgette assembly; valve assembly; and ciruit board assembly. Objective observations are made concerning interpersonal relations, communications skills, responses to training techniques and supervision, attendance, punctuality, grooming, and dress. (Vocational Research Institute - Jewish Employment and Vocational Service).

Vocational Interest and Sophistication Assessment - VTSA provides a reading-free picture instrument to obtain a measure of an individual's interest in and knowledge about a series of job options at the unskilled and semi-skilled levels. It is targeted toward mildy retarded adolescents and young adults, and takes between 30-60 minutes to complete. (O.S.U. Nisonger Center).

Wesman Personnel Classification Tests - WPC is a test of mental ability designed for use in the selection of employees for clerical, sales, supervisory, and managerial positions. The verbal subtest requires the use of reasoning through analogy and the perception of relationships in order to correctly respond to the item. The numerical subtest measures competence in basic arithmetic skills and processes and general facility in the use of numerical concepts. (The Psychological Corporation).

Wide Range Employment Sample Test - WREST was developed to measure work productivity on the basis of quantity and quality. Its main purposes are to a) determine horizontal or technical skills, b) provide a standardized method of job skill learning, c) identify employability level, and d) assist in job selection. Scores are provided on folding, stapling, packaging, measuring, stringing, gluing, collating, color matching, assembling, and pattern matching. This tool may be used with individuals age 16 through adult in the general population, as well as sheltered workshop and industrial settings. Total administration time is 2 hours. (Jastak Associates, Inc.).

E. OTHER USEFUL ASSESSMENT INSTRUMENTS

1. Pre-testing Procedure

Test Orientation Procedure - This package contains a tape recording and two booklets. It was designed specifically for disadvantaged job applicants with little prior testing experience. The first booklet, used together with the tape, provides general information on how to take tests. The second contains practice tests. In the absence of a tape recorder, the examiner may need instructions from a printed script. (The Psychological Corporation).

USES Pretesting Orientation Exercises - POEs were developed by the United States Employment Service to provide practice for the disadvantaged individuals who will be taking the GATB. The exercises themselves, the format of the test booklet used with them, and the manual containing directions for administration all closely resemble their GATB counterparts. A standard GATB answer sheet actually is used to complete the exercises. The exercises have been designed to reduce differences in aptitude scores resulting from disadvantaged clients being less familiar with test content, less able to understand test direcions and having less frequent experience in taking tests of any kind. (U.S. Government Printing Office).

USES Pretesting Orientation on the Purpose of Testing - This is a short, illustrated lecture and discussion technique that has been designed to reduce anxiety and increase motivation for testing in disadvantaged individuals by delivering information about the purposes of testing. In the half-hour orientation session a group listens to a narrator read from a prepared script of 23 topics, each with an accompanying picture. Thirteen of the topics pertain to what an aptitude test is and why it is administered, and ten provide test taking tips. (U.S. Government Printing Office).

2. Vocational Interests

AAMD-Becker Reading - Free Vocational Interest Inventory - The Inventory is a non-reading vocational preference test which identifies areas and patterns of occupational interests in mentally retarded people at the unskilled and semi-skilled levels. Scores are provided on automotive, building trades, clerical, animal care, food service, patient care, horticulture, janitorial, personal service, materials handling, laundry service, light industrial and housekeeping scales. Total administration time is 45 minutes or less. (American Association on Mental Deficiency).

Career Assessment Inventory - CAI is intended for students who are not seeking baccalaureate degrees, and who are undecided about their vocational plans. It is designed for individuals seeking career opportunities requiring a minimum of post-secondary education such as community college, technical training, or business school. Their interests are compared with those of workers in occupations needing less than a four-year college education. Target population includes 8th grade through adults. Total administration time is 40 minutes. (NCS Interpretive Scoring Systems).

Career Guidance Inventory - CGI was designed for counseling students with interests in trades, services, and technologies. Scores are reported for 14 engineering related trades (such as masonry, painting and decorations, electrical engineering) and 11 non-engineering related services (such as communications, data processing, and sales). (Educational Guidance, Inc.).

Career Guidance Inventory in Trades, Service and Technologies - CGI is a special interest inventory designed for students who are not planning on four or more years of college. It aids counselors who help students or adults plan career objectives. There are 25 scales for which CGI produces scores, such as carpentry and woodworking, masonry, mechanical repair, sheet metal and welding, drafting and design technology, chemical and laboratory technology, environmental health technology, agriculture and forestry technology, business management, communications, sales, transportation services, protective services, medical technology - laboratory, medical technology - nursing, food service, and several engineering technologies. (CTB/McGraw-Hill).

Harrington-O'Shea Career Decision-Making System - CDM is a self administered assessment tool which measures vocational interests, occupational abilities, and work related values. It is targeted for 7th grade to adults and provides scores on six interest areas including crafts, the arts, social, business, clerical and science. Total administration time is 45 minutes. (Amercian Guidance Services).

How Well Do You Know Your Interests? - This instrument was designed to collect information about likes and dislikes of certain jobs, activities, things, and people. It yields a 55 item profile of occupational interest factors to guide the student's career exploration and decision making. (Edupac, Inc.).

Interest Determination, Exploration and Assessment System - IDEAS is a self-scorable interest inventory which provides scores in mechanical/fixing, electronics, nature/outdoors, science, numbers, writing, arts/crafts, social service, child care, medical service, business, sales, office practices, and food service. It is intended for grades 6-12, and has a total administration time of 30-40 minutes. (NCS Interpretive Scoring Systems).

Jackson Vocational Interest Survey - JVIS was designed to provide scores representing interests and preferences relevant to work. There are 34 basic scales, including creative and performing arts, mathematics, skilled trades, dominant leadership, business, sales, law, human relations, management, and professional advising. It is appropriate for high school to adult levels, and takes one hour to administer. (Research Psychologists Press, Inc.).

Judgement of Occupational Behavior - Orientation - JOB-O is an exploratory instrument keyed to the top 120 jobs that show growth potential in the coming decade. It is updated every two years, with job titles added or deleted in accordance with predictions in the Occupational Outlook Handbook. The self assessment phase narrows job titles to those best matching personal needs. JOB-O is appropriate for 7th grade through adult levels and takes between 45-75 minutes. (CFKR Career Materials, Inc.).

Kuder Career Development Inventory - KCDI indicates possible career paths to explore in each of six broad interest areas at three levels of entry based on the amount of education generally required. Scores are provided in the following occupational clusters: technical/mechanical/skilled, scientific/theoretical, artistic/literary/musical, social service/personal service, persuasive/managerial, and clerical/computational. This instrument is appropriate for out of school youth, as well as those in the 9th and 10th grades, and takes 60-75 minutes to administer. (Science Research Associates).

Kuder General Interest Survey - Form E - This instrument measures broad vocational interests and is most appropriate at the junior high school level. It takes between 40-50 minutes to administer, and provides scores in outdoor, mechanical, computational, scientific, persuasive, artistic, literary, musical, social service, and clerical areas. (Science Research Associates, Inc.).

Kuder Occupational Interest Survey - Form DD - This tool measures occupational interests of 10th to 12th grade and adult populations. Scores are provided on 126 occupational and 48 college major scales. Total administration time is approximately 40 minutes. (Science Research Associates Inc.).

Kuder Preference Record - Vocational - This instrument is used for counseling and placement of high school students and adults. It provides ter interest scales, including outdoor, mechanical, scientific, computational, persuasive, artistic, literary, musical, social service, and clerical. Completion time is 30-40 minutes. (Science Research Associates, Inc.).

Minnesota Vocational Interest Inventory - MVII contains nine general interest measures, including mechanical, health service, office work, electronics, food service, carpentry, sales, and outdoors. It also yields 21 occupational scales for skilled jobs such as baker, carpenter, and plumber. (The Psychological Corporation).

Ohio Vocational Interest Survey, Second Edition - OVISII assesses interest in 24 occupational clusters including manual work, basic services, machine operation, quality control, clerical, health services, crafts and precise operations, skilled personal services, sports and recreation, customer service, regulations enforcement, communications, numerical, visual arts, agricultural and life sciences, engineering and physical sciences, music, performing arts, marketing, legal services, management, education and social work, and medical service. Between 35-60 minutes are required for administration. (The Psychological Corporation).

Peabody Individual Achievement Test - PIAT is an individually administered, wide-range achievement battery with subtests in mathematics, reading recognition, reading comprehension, spelling, and general information. No written responses are required by the subject - he responds orally or by pointing. The mathematics subtest measures basic skills such as matching, discrimination, and number recognition - as well as advanced concepts in geometry and trigonometry. In the reading recognition subtest, the examinee is required to match letters of the alphabet, name individual letters, and read aloud individual words. The items in this subtest range in difficulty from the preschool through high school level. For the reading comprehension subtest, the examinee silently reads a sentence and then must select the one of four illustrated options which best represents the meaning of the sentence. The item difficulty range for the spelling subtest is kindergarten through high school For this subtest, the examinee is asked to select the letter of the alphabet as being different from the other items pictured, identify the letter that represents a speech sound or named letter, and point out the correct spelling for individual words which have been pronounced and used in sentences by the examiner. Topics such as science, social studies, fine arts, and sports are included on the general information subtest designed to tap general knowledge which can be acquired in situations other than school. (American Guidance Services, Inc.).

Picture Interest Exploration Survey - PIES was designed to help in the investigation of individuals' vocational interests and to apply this information to pursuing career goals. A PIES test kit includes 160 color slides, 2 slide trays, 1 audio tape, 2 sets of career reference cards, 1 student-teacher manual, and 50 response sheets. Colored 35mm slides are utilized to depict 12 specific careers within each of 13 career clusters. The career-cluster system is based on the Occupational Outlook Handbook and is cross-referenced to the Dictionary of Occupational Titles. Each slide shows a worker's hands performing a task considered to be representative of a particular occupation within a career cluster. Users indicate interest in a particular career by circling the number of that slide on their response sheet. The survey may be administered individually, in a group, or self-administered. (Educational Achievement Corporations).

Planning Career Goals - PCG assesses a variety of abilities, interests, values and occupational information pertinent to 12 fields of work. This battery of tests assists individuals at the 8th to 12th grade levels in making realistic educational and career plans. Planning is based on a) knowledge of one's own traits and preferences and b) comparisons with people who are actually employed in the person's preferred career. Test time is approximately 4 hours and 45 minutes. (CTB/McGraw-Hill).

Strong-Campbell Interest Inventory - SCII measures an individual's occupation interests, not aptitude or intelligence, by comparing his/her scores on a number of scales with scores of a) people in general and b) people in a wide variety of occupations. It has six general occupational themes, 23 basic interest scales, and 162 occupational scales. This instrument is appropriate for 8th grade through adult levels, and requires 20-60 minutes to administer. (Stanford University Press).

USES Interest Inventory - This instrument provides measures of occupational interest in the 12 interest areas into which all 4th edition DOT-defined occupations have been classified in the USES Guide for Occupational Exploration. The 12 scales include artistic, scientific, plants and animals, protective, mechanical, industrial, business detail, selling, accommodating, humanitarian, leading-influencing, and physical performing. The interest inventory can be completed within 15-20 minutes. (U.S. Government Printing Office).

Wide Range Interest-Opinion Test - WRIOT was developed to determine interests and attitudes of individuals regardless of age, sex, mental ability, cultural background, or educational level. It does not require reading or language understanding and can be used with a translation of the instructions and report form in any language. The instrument consists of 150 sets of three line drawings, each depicting people working at some activity. The test-taker responds to each set with the most and least preferred. Completion time is approximately 40 minutes. (Jastak Associates, Inc).

World of Work Inventory - WWI facilitates selection of an appropriate career or vocation consistent with personal interests, aptitudes and temperaments. Scores are provided on the following scales: career interest activities, job satisfaction indicators, and vocational training potentials. The instrument is appropriate for 8th grade through adult levels, and requires 2 1/2 hours to complete. (World of Work, Inc.).

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GUIDE FOR SETTING TITLE II A
PERFORMANCE STANDARDS

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PREFACE

The development of performance standards under the Job Training Partnership Act (JTPA) is a particularly important responsibility for both the Secretary and the Governor. This document is intended to provide information and guidance for Governors and their staffs on establishing performance standards and data support systems.

On April 12, 1983, the Department issued performance standards for the initial nine months of JPTA. At about the same time, notice was given that the Department has a more developed system for performance standards which it plans to implement upon approval from the Office of Management and Budget (Cf., Federal Register, 4-26-83, pp. 18924-18940).

This guide provides detailed guidance and optional approaches for performance standards and reporting systems during the initial planning phase of JTPA programs. It makes available the Department's recommended methodology for setting standards so as to simplify the Governors' tasks in setting local performance standards as required by Section 106 of JTPA. At the same time, the use of the system suggested in the guide in no way limits the authority of the Governor. The Employment and Training Administration stands ready to provide any assistance the Governors (and their staffs) require.

Questions or suggestions concerning the information in this guide are welcome and should be addressed to
Ms. Kay Albright, Room 9002, 601 D Street, N.W.,
Washington, D.C. 20213.

GUIDE FOR SETTING TITLE II-A PERFORMANCE STANDARDS

INTRODUCTION

I. REASONS FOR PERFORMANCE STANDARDS & ELEMENTS OF THE SYSTEM

JTPA was designed to be a performance driven program and performance standards are the tools to assure that the program is a productive investment in human capital.

PERFORMANCE STANDARDS - CENTRAL FEATURE OF JTPA

Predetermined performance standards to assure achievement of the program's objectives, therefore, form a central feature of the Job Training Partnership Act (JTPA).

Section 106 of the Act assigns the responsibility for the establishment and application of performance standards to both the Secretary of Labor and the Governors. Before describing these responsibilities and the intended guidance provided in this document, let us examine briefly the elements of the performance standards system:

Performance standards established by the Secretary are intended to provide the Governor with the basis for determining those service delivery areas (SDAs) which are entitled to rewards or sanctions, or need technical assistance. The elements of the system to do this are as follows:

- Measures. Seven performance measures have been selected for setting performance standards (Adults: Entered Employment Rate, Cost per Entered Employment, Average Wage at Placement, and Welfare Recipient Entered Employment Rate. Youth: Entered Employment Rate, Positive Termination Rate, and Cost per Positive Termination).

- Setting the Standard. For each of the measures cited above, Governors will need to set a local SDA standard in accordance with the procedures established by the Secretary. In determining local standards, Governors should take into consideration the impact of local factors which will likely influence performance against the standard.

- Application of the Standard. Once the standard is determined, it will be the Governor's responsibility to apply the standards after the period of performance, determine whether the standards have been met, and provide rewards, sanctions, or technical assistance as appropriate.

II. PURPOSE AND BACKGROUND

In accordance with the elements noted above, it is the Governor's responsibility to:

GOVERNOR'S RESPONSIBILITY - DEVELOP AND IMPLEMENT JTPA PERFORMANCE STANDARDS SYSTEM

- implement JTPA performance standards;
- develop an overall reliable, quantifiable, objective performance standards system (i.e., how will the standards be set, when will performance results be reviewed and by whom, how will performance results be reviewed and by whom, how will incentives/technical assistance funds be distributed, etc.);
- establish a management information system which is responsive to several different levels of need; and
- implement an objective adjustment methodology to account for differences in local conditions.

This document contains information and instructions which can greatly assist in these tasks. Governors who choose to adopt the systems described in this guide will have a significant amount of systems design and developmental work already done. Therefore, the initial nine-month period may be used as a practice period for implementing a Statewide performance standards system with relative ease.

Governors will then have some experience and be able to equitably judge and reward good performance and provide appropriate technical assistance to poor performers. After this initial period, they will be able to document and sanction continued poor performers.

PARAMETERS

The performance standards requirements established for the initial program period, October 1, 1983 - June 30, 1984, do not prescribe any limitations within which Governors may vary the performance standards. It is, however, anticipated that the Secretary will prescribe such parameter limitations in future years. It is for this reason that parameters have been included on the worksheets. Those Governors who choose to use the optional, nationally developed adjustment methodology provided in this guide during the initial nine-month period will be able to gain some practical experience in working with the methodology which the Department may mandate be used in future years.

This Technical Assistance Guide (TAG) describes how a Governor may use the nationally developed adjustment methodology to adjust the national average performance level to account for differences in local conditions.

This document reflects the package that went to the Office of Management and Budget (OMB). In the future the parameters reflected on the worksheets may be required.

III. OBJECTIVES

This document is intended to demonstrate:

- How performance standards may be used throughout the JTPA program cycle - in planning, monitoring, assessment and evaluation;
- How data are used in establishing and adjusting performance standards;
- How objective decisions may be made on performance incentives and provisions for technical assistance;
- How SDA standards may be established that incorporate unique local conditions; and
- The need for a reporting system, such as is described, to support the seven standards as well as prospective future standards on the post-program goals of increased earnings and reduced welfare dependency.

IV. REASONS FOR OPTING TO USE THE NATIONALLY DEVELOPED ADJUSTMENT METHODOLOGY

ADJUSTMENT
METHODOLOGY
TREATS ALL SDAs
ALIKE

The Governors are permitted to vary the performance standards established by the Secretary without limitations during the initial nine-month period. While the Governors are much more aware of their jurisdictions' local circumstances than the Department, they still face the problem of varying the performance standards fairly and consistently from SDA to SDA. If this is not done, the Governors may be deluged with complaints that they varied the standards arbitrarily. The adjustment methodology described in PART C of this TAG will account for 15 unique local factors (dependent on the performance measure) the same way for all SDAs. So, all SDA jurisdictions -- new and old -- are treated alike for purposes of adjusting the performance standards. At the same time, PART C of this TAG acknowledges that an SDA may have exceptional circumstances not accounted for in the nationally developed adjustment methodology. The Governors are free to determine the importance of these exceptional circumstances as they relate to performance expectations, either positively or negatively. Since some types of exceptional circumstances rarely occur Statewide, the appropriateness of adjusting an SDA's performance standards individually is less likely to create disharmony among all the SDAs.

"POOR
PERFORMANCE" IS A
RELATIVE TERM

Further, experience has shown that "poor performance" is a relative term. What may be poor performance for one area, based on its local conditions, may be good performance for another, based on its local circumstances. For instance, few would argue that an SDA which planned an entered employment rate of 18% is a poor performer. But, if the SDA had an unemployment rate of 23%, the planned rate might actually be slightly ambitious to achieve. The nationally developed adjustment methodology assists one in evaluating whether a planned level is realistic based on a set of selected local factors. Like the unusually high unemployment rate situation, an SDA may wish to focus heavily on a hard-to-place segment of the population, such as welfare recipients. One would not expect such an SDA to plan as high an entered employment rate as one would expect of an SDA which planned to serve a nominal number of welfare recipients. The choice of whom to serve is at the discretion of the local operator but the performance expectations are adjusted accordingly.

Lastly, the model has the potential for reducing documentation requirements for 15 local factors which Governors might deem necessary to impose if each SDA's performance standards were adjusted judgmentally.

V. DESCRIPTION OF THE TECHNICAL ASSISTANCE GUIDE

This TAG consists of three parts.

PART A outlines a suggested framework within which Governors may choose to operate their performance standards system. The suggested framework encourages the use of the nationally developed adjustment methodology and describes an application strategy for using this methodology in several operational areas.

PART B provides a model reporting system which has been specifically designed to support the application of the nationally developed adjustment methodology. This part includes a sample report format, detailed instructions for completing the form, selected definitions needed to collect the data uniformly, and a guide for designing and implementing a followup system.

PART C describes the nationally developed adjustment methodology, including the rationale behind the methodology. It also includes instructions on how to utilize the methodology. Lastly, this part provides the user with a partial list of reasons which a Governor might consider appropriate for varying the standards which have been adjusted by using the nationally developed adjustment methodology.

While it is possible that a Governor might choose to adopt some, but not all, of the systems described in this TAG, the Governors are urged to carefully consider the systems prior to making any final decisions.

PART A
IMPLEMENTING PERFORMANCE STANDARDS: A GUIDE FOR THE GOVERNOR

I. INTRODUCTION

PERFORMANCE STANDARDS - PIVOTAL ROLE IN GOOD PROGRAM MANAGEMENT

Performance standards are an integral part of the JTPA legislation involved with planning, implementing, managing, assessing, and evaluating the program. As such, they can play a pivotal role in good program management throughout the program year cycle. This section describes how performance standards can be used as key management tools in each of those functions.

The following is a summary of those sections of the Act which provide the foundation for the use of performance standards throughout the program cycle. Referenced sections below refer to procedures which must be developed and implemented in order for a Governor to fulfill his responsibilities with regard to performance standards:

- Section 104 -- describes what each job training plan shall contain. It establishes the need for detailed program and budget planning, coordination, fiscal accountability, and the requirement to establish performance standards goals. It also sets the requirements for the annual report to the Governor which include the extent to which the activities exceeded or failed to meet relevant performance standards;
- Section 105 -- outlines requirements for the Governors' review and approval of job training plans;
- Section 106 -- outlines the Governors' authority to adjust performance standards within the parameters established by the Secretary, and describes what steps Governors must take if their SDAs do not meet their performance standards;
- Section 202 -- prescribes the Governors' responsibilities for providing incentive grants for programs exceeding their performance standards; and
- Section 121 -- describes State responsibilities in relation to the Governor's Coordination and Special Services Plan. Several of the State's responsibilities outlined in this section pertain to the developmental and implementation requirements for a performance standards system in the context of planning, monitoring, and program

evaluation. This section also requires the Governors to report the adjustments made in performance standards and the factors that are used in making the adjustments.

As one can see from the above citations, the Governor has a number of decisions to make early on concerning performance standards. For instance, the Governor must:

GOVERNOR HAS A NUMBER OF DECISIONS TO MAKE EARLY ON

- Determine what planning data will be required to be submitted by the SDAs and in what format (i.e., require planning data to be submitted on quarterly or annual basis);
- Determine what adjustment methodology will be used to vary the standards;
- Determine whether SDA standards will be established unilaterally or through a negotiation process;
- Determine what factors will be considered in making adjustments to the standards, and what documentation the SDAs will have to submit concerning these factors; and
- Determine the basis for apportioning the incentive/technical assistance funds at the end of the year.

II. PLANNING PROCESS

PLANNING INFORMATION REQUIRED

As Governors are preparing their statements of goals and objectives, they need to determine what planning information they will require their SDAs to include in their job training plans. At a minimum, the Governors will need the following 10 planned performance outcome data items to determine the expected outcomes on the seven Title II-A performance measures:

1. The number of adults who terminated;
2. The number of adults who entered employment;
3. Total expenditures for adults;
4. The wages for all adults who entered employment at the time of termination;
5. The number of adult welfare recipients who terminated;

6. The number of adult welfare recipients who entered employment at termination;
7. The number of youth who terminated;
8. The number of youth who entered employment at termination;
9. The number of youth who had a positive termination (both entered employment and employability enhancement terminations); and
10. Total expenditures for youth.

This minimum list of planned performance data will provide the information needed to derive the expected outcomes for the following measures:

ADULT MEASURES

- Adults
  - Entered Employment Rate - The number of adults who entered employment as a percentage of the number of adults who terminated;
  - Cost per Entered Employment - Total expenditures for adults divided by the number of adults who entered employment;
  - Average Wage at Placement - Average wage for all adults who entered employment at the time of termination; and
  - Welfare Entered Employment Rate - The number of adult welfare recipients who entered employment at termination as a percentage of the number of adult welfare recipients who terminated.

YOUTH MEASURES

- Youth
  - Entered Employment Rate - The number of youth who entered employment as a percentage of the number of youth who terminated,
  - Positive Termination Rate - The number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminated; and
  - Cost per Positive Termination - Total expenditures for youth divided by the number of youth having a positive termination.

FACTORS IN THE MODEL

Furthermore, since Governors may prescribe variations in the performance standards based on specific economic, geographic, and demographic factors, in accordance with Section 106(e), they may wish to require their SDAs to submit planning information concerning such factors in their job training plans. Governors who elect to utilize the nationally developed adjustment methodology, which will be described later in this TAG, to establish SDA specific performance standards will need to obtain from their SDAs planning data on the following local factors:

- Terminee Characteristics (Adults) - number and/or percent of
  - Female
  - 45-54 years old
  - 55 years and over
  - Black
  - Hispanic
  - Other minority
  - Dropout
  - Handicapped
  - UI claimant
  - Welfare recipient
- Terminee Characteristics (Youth) - number and/or percent of
  - Female
  - 14-15 years old
  - 16-19 years old
  - Black
  - Hispanic
  - Other minority
  - Dropout
  - UI claimant
  - Welfare recipient
- Average Weeks Participated (Adults)
  - Average number of weeks of participation of all adult terminees
- Average Weeks Participated (Youth)
  - Average number of weeks of participation of all youth terminees

NOTE: Calculation instructions for Average Weeks Participated are included in PART B, Subpart B, Section II, Line 28.

BEST COPY

- Local Economic Conditions for the SDA
  - Unemployment rate
  - Average wage for the area

NOTE: See PART C, Subpart C of this TAG for an explanation of the average wage for the area factor.

The Act already requires SDAs to submit some of this information to the Governors in their job training plans. For instance, Section 104(b)(2) requires that the job training plans contain a description of the services to be provided, including the estimated duration of services, and the estimated training cost per participant. Furthermore, Section 104(b)(10) requires that the job training plans contain procedures for the preparation and submission of an annual report to the Governors which shall include:

- a description of activities conducted during the program year;
- characteristics of the participants; and
- the extent to which the activities exceeded or failed to meet relevant performance standards.

Consequently, it makes common sense for the Governor to develop basic planning and reporting formats to be used by all the SDAs.

While the data required for the adjustment methodology are necessary only on an annual basis, the Governors should consider collecting all of the planning data on a quarterly basis. This will facilitate programmatic and compliance monitoring.

VARIATIONS MAY BE CALCULATED BY THE GOVERNOR

For those Governors who choose to employ the national adjustment methodology (see PART C), they have two options concerning who calculates the SDA performance standards. First, the Governors could choose to ask the SDAs to report their planned performance on the 15 local factors and the outcome data described earlier as part of the planning process. The Governors would then take the planning data for local factors obtained from the SDAs and, using the national methodology, adjust the national departure point for each measure for each SDA. Then the Governor could further vary the Model-Adjusted Performance Standard to take into consideration exceptional circumstances not accounted for in the model and/or the Governor could impose a productivity improvement factor on all SDAs in the State. As indicated earlier, this final adjustment would result in the SDA's Performance Standard for each measure. Governors should then ensure that planned outcomes in the SDA Job Training Plan are consistent with the performance standards. Governors have the option of imposing performance standards goals on the SDAs or negotiating the final standards with the SDAs.

VARIATIONS MAY BE CALCULATED BY THE SDAs

Second, Governors could provide SDAs with the worksheets at the beginning of the planning process and require the SDAs to calculate the SDA performance standard for each measure using the nationally developed adjustment methodology. The completed worksheets could be incorporated into the SDA Job Training Plan submission to the Governor. The Governor could then, if appropriate, negotiate with the SDA on whether or not to adjust the Model-Adjusted Performance Standard based on exceptional circumstances not accounted for in the model; and if so, by how much. The Governor could then impose a productivity improvement factor on the SDAs in the State. The adjusted level would become the SDA Performance Standard for each measure for the initial period.

CALCULATION MADE BY SDAs MAY BE MORE ADVANTAGEOUS

The second alternative may be more desirable for several reasons. It allows the SDAs to see how different service strategies and participant mix affect adjustments made to the national departure point. It also enables SDA officials to understand how various local factors affect performance. The most important advantage, however, is that the better an SDA understands how certain factors influence performance, the greater the likelihood that the SDA will use the methodology as it self monitors its performance. Thus, the SDA will be able to determine whether it is failing to meet a standard and pinpoint the problem area(s). This information will allow SDA officials to determine whether a modification is needed, or a policy decision is needed, or staff guidance and training are necessary. The use of this approach will require that key SDA staff receive training from State staff on how to adjust for local conditions.

III. MONITORING

STANDARDS PLAY A KEY ROLE IN MONITORING

As Governors exercise their oversight responsibilities, comparing SDA actual performance to standards will probably be a key focus in this activity. In addition to monitoring their SDAs' performance against their standards, the Governors may also wish to monitor their SDAs' fund utilization practices (i.e., are the SDAs spending their funds in accordance with pre-determined schedules), the equity of service to AFDC recipients and dropouts requirements, the 40% youth expenditure requirement, etc. These comparisons could be conducted on a quarterly basis, or more or less frequently, as determined to be appropriate by the Governor.

NEED PERIODIC REPORTS

However, in order to use standards and/or other indicators, such as fund utilization, as a basis for monitoring requires that the Governors receive periodic reports from SDAs on program outcomes, costs, and other information deemed necessary to track performance progress. Without such data, monitoring progress against standards is not possible.

QUARTERLY MONITORING ENCOURAGED

Monitoring progress on a regular basis does serve an important management purpose. The advantage to quarterly monitoring is that it affords the Governor an opportunity to detect problems in a timely fashion. These problems can then be brought to the attention of the appropriate management officials. Further, SDAs will have adequate time to address the problems. Early problem identification and corrective action practices may mean the difference between an SDA receiving a reward or being sanctioned in future years.

SDAs SHOULD CONDUCT SELF MONITORING

It is also desirable for SDAs to conduct self monitoring. They need to know whether they are meeting their performance standards; and if not, the reasons why. Those SDAs which are required to fill out the worksheets prior to submitting their job training plans will have a much better understanding of what factors influence performance -- positively or negatively. Consequently, they can detect performance deficiencies early and can take immediate steps to correct such deficiencies.

IV. END-OF-YEAR PERFORMANCE REVIEW

NO PENALITIES DURING INITIAL NINE MONTHS

Ultimately, the Governors will have to review their SDAs' actual performance against the performance standards and determine which ones are entitled to incentive grants and which ones must be provided technical assistance. No SDA, however, shall suffer a penalty for not meeting its performance standards during the initial nine-month period. However, the potential for "sanctioning" will give performance standards even more importance in the future.

END-OF-YEAR REVIEW

The fairest way to determine whether an SDA achieved its performance standards is to take into consideration actual conditions which existed during the performance period. For instance, suppose an SDA planned to serve a significant number of welfare recipients; consequently, the Governor approved a relatively low entered employment rate for that SDA. However, despite the SDA's best efforts, it served very few welfare recipients and had a relatively high entered employment rate at the end of the year. Eventually, the Governor must decide whether that SDA deserves an incentive grant, even though it did not serve the harder-to-place participants as planned. At the same time, the Governor may also be faced with taking adverse action against an SDA which did not plan to serve a significant number of welfare recipients, but did; and consequently, had a lower actual entered employment rate than originally planned.

The Governor who chooses to reward and penalize the SDAs based on the planned performance standards, regardless of actual conditions which occurred during the year, will soon find that many of the later job training plans will plan to serve hard-to-place groups in order to justify low planned outcomes even though they may not actually be able to serve such clients. Thus, many of the SDAs will serve easier-to-place participants and will wind up with higher outcomes than planned. At this point, incentive grants will become meaningless.

RECALCULATE STANDARDS USING ACTUAL DATA

The alternative is to recalculate the performance standards at the end of the year based on actual conditions. The national methodology can be used at the end of the year to recalculate SDA performance standards based on actual terminee characteristics, average weeks of program participation, and updated economic conditions. The recalculated standards could thus be used to determine which SDAs achieved their performance standards.

If the Governors decide that SDA standards are to be recalculated for the end-of-year performance review, the Governors will need to require SDAs to submit actual data for certain items at the end of the nine-month period. These items will include the program outcome and cost data necessary to compute the appropriate performance measures, as well as data for the local factors contained in the national methodology used to adjust the performance standards for local conditions. The national methodology cannot be used without this data. Governors will no doubt be asking for outcome data anyway and would likely want to know the characteristics of who was actually served by an SDA.

Upon receipt of the end-of-year JTPA performance data, the appropriate worksheets could be used to recalculate the SDA's Performance Standard for each measure for each SDA. As stated earlier, the recalculation should be based on actual performance data and updated economic information for the appropriate local factors. Unless the Governor chooses to further vary the recalculated Model-Adjusted Performance Standard for exceptional circumstances, the recalculated number becomes the SDA's final performance standard. However, as was true in the planning process, the Governor may also make adjustments to the recalculated Model-Adjusted Performance Standard based on exceptional circumstances which may have occurred in an SDA's jurisdiction, or if he imposed a productivity improvement factor on the SDAs in the State. Once this is accomplished, the adjusted number becomes the SDA's final performance standard.

DETERMINING WHETHER THE STANDARDS WERE MET

In future years, the Governor should then compare actual performance for each SDA against the final performance standards in order to determine whether the standards were met. The results of this end-of-year performance review would determine which SDAs are eligible for incentive grants and which SDAs require technical assistance.

It should be pointed out, however, that recalculation may pose a problem for those Governors who do not choose to conduct periodic monitoring of performance against the standards. Suppose a Governor approved an SDA's planned performance standards at the beginning of the year and then did not look at the SDA's performance against those standards until the end of the year. If the SDA met the approved planned performance standards, but not the recalculated ones, the SDA should not be penalized. On the other hand, if the Governor monitored the SDA's performance throughout the year, alerted it of deviations from the standards, and the SDA took no action, the SDA should be penalized.

V. EVALUATION

EVALUATION IS A GOOD MANAGEMENT TOOL

As a management tool, Governors may find that an evaluation of past years' experience provides an objective and critical basis for establishing future years' planning objectives. This experience may be quite valuable in making refinements in methods of adjusting standards, focusing more clearly on State initiatives, and refining overall Statewide employment and training policy.

PART B, Subpart C contains a section which describes ways in which Governors or SDAs may use followup data for purposes of conducting other specific types of program evaluation.

PART B
SUGGESTED REPORTING SYSTEM

I. INTRODUCTION

The following reporting system is optional. Governors should be aware, however, that the Department has submitted the following reporting system to the Office of Management and Budget (OMB) in accordance with the requirements of the Paperwork Reduction Act. Should the reporting system be approved, the data reported to the Federal level will be used for the following purposes:

FEDERAL LEVEL USES FOR REPORTED DATA

- To let the Department, Congress, and the public know how the program is doing;
- To prepare the statutorily required reports to the Congress concerning the progress of the program;
- To update the data base used to construct the analytical models used to adjust the performance standards based on local conditions; and
- To set performance expectations.

STATE LEVEL USES FOR REPORTED DATA

Data reported to the Governors will be used to:

- Allow the Governor to make decisions concerning which SDAs are eligible for incentive grants and which are in danger of requiring corrective action;
- Provide historical data for analytical purposes prior to the preparation of the Governor's goals and objectives statement;
- Periodically monitor the SDAs' progress toward meeting their standards;
- Respond to questions from interested parties regarding how the program is doing;
- Provide past experience data needed for the preparation of statutorily required progress information to be submitted to the Secretary; and
- Provide basis for further evaluation, at both the State and SDA level, as to what is working and why, what policy or programmatic changes need to be made, etc.

Consequently, a good management information system is essential.

PROPOSED SYSTEM REPRESENTS MINIMUM REQUIREMENTS

The following reporting system represents the bare minimum which the Department believes is necessary in order to carry out its responsibilities under the Act. The reporting system will provide an adequate data base for the establishment of longer-term standards based on the post-program information collected and reported. Governors will probably need more information than is reflected on the following pages and they are free to require their SDAs to submit more information to meet their needs in accordance with Section 104(b)(10).

This reporting system has been developed to assist the Governors in identifying the minimum data they would need to have collected and reported to them if they chose to recalculate the performance standards at the end of the program period and use the nationally developed adjustment methodology to take into consideration differences in local conditions.

FOLLOWUP DATA REQUIREMENTS INCLUDED

In addition to collecting information needed to recalculate SDA Performance Standards, the sample report format and instructions also include a section regarding followup data which the Governors may wish to consider requiring their SDAs to collect. Since the Department is planning to issue performance standards based on followup information in future years, Governors may wish to use the initial program year to test the followup methods described and provide the Department with feedback concerning problems encountered, the costs involved, and alternatives on how an SDA might go about collecting post-termination data which could be used for setting performance standards at the national level. The followup data items included in the reporting system are the type of data which will be required and subsequently used to set longer-term performance standards, if the Department receives approval from OMB.

It is important to consider the reporting of followup information during this initial period as a trial or test process. No rewards or sanctions will be based on this reporting, but it is in everyone's interest to have the data be as good as possible for the purpose of future standards setting. The experience gained during this period will allow SDAs to more accurately predict termination levels and conform to proper sampling techniques. In subsequent years, this will be particularly important as such techniques will be subject to close scrutiny in terms of the ultimate sufficiency of the data and because Governors will use the data to make decisions concerning rewards and technical assistance/sanctions.

Note that throughout the reporting instructions, references are made to items appearing in the Participant Record. This is an optional document which will be transmitted under separate cover.

II. GENERAL INSTRUCTIONS

Governors who choose to implement this suggested reporting system should require each of their SDAs to submit the JTPA Annual Status Report (ASR) for Title II-A (Columns A-C) programs. If the Governors choose to collect the information on a more frequent basis, the suggested format and instructions may be modified fairly easily to reflect any frequency intervals determined appropriate by the Governors.

Column D of the form was designed to facilitate the collection and reporting of Title III data on a Statewide basis. Governors should note that the information reflected on Column D of the ASR is different from the information they are currently submitting on the Quarterly Status Report. If the Department receives approval from OMB, Column D will be required at a later date. The Title III data is especially important since the Department currently has an inadequate data base for use in establishing performance standards in future years.

Note that one should exclude Title II-B, Summer Youth Employment and Training Program (SYETP) from the ASR.

The remainder of this part of the TAG is divided into three subparts. Subpart A has a facsmile of the suggested reporting form. Subpart B includes reporting instructions for completing the suggested reporting form. Lastly, Subpart C provides one with additional information concerning the development and implementation of followup systems.

SUBPART A

FACSIMILE OF SUGGESTED REPORTING FORM (ASR)

U.S. DEPARTMENT OF LABOR
Employment and Training Administration

JTPA
ANNUAL STATUS REPORT

a. STATE/SDA NAME AND ADDRESS

b. SDA NO. OR STATEWIDE

c. REPORTING PERIOD
From | To

FOR FEDERAL OFFICE USE ONLY

d. TYPE OF PROGRAM
("X" appropriate box(es))

1. ☐ Title II-A
2. ☐ Title III
3. ☐ Other (specify) ____________

I. PARTICIPATION AND TERMINATION SUMMARY	TOTAL ADULTS (A)	ADULTS (WELFARE) (B)	YOUTH (C)	DISLOCATED WORKERS (D)
A. TOTAL PARTICIPANTS				
B. TOTAL TERMINATIONS				
1. Entered Unsubsidized Employment				
a. Entered Registered Apprenticeship Pgm.				
b. Entered Armed Forces				
2. Youth Employability Enhancement Termination				
a. Entered Non-Title II Training				
b. Returned to Full-Time School				
c. Age 14 - 15 Completed Program Objectives				
d. Completed Major Level of Education				
3. OTHER TERMINATIONS				

LINE NO.	II. TERMINEES PERFORMANCE MEASURES INFORMATION A. CHARACTERISTICS OF TERMINEES		(A)	(B)	(C)	(D)
1	SEX	Male				
2		Female				
3	AGE	14 - 15				
4		16 - 19				
5		20 - 21				
6		22 - 44				
7		45 - 54				
8		55 and Over				

e. SIGNATURE AND TITLE

f. DATE SIGNED

g. TELE. NO.

PROPOSED ETA 8580 (Mar. 19[illegible])

STATE/SDA NAME AND ADDRESS	b. GRANT NO.	c. REPORT PERIOD From / To	d. TYPE OF PROGRAM

LINE NO.	II. TERMINEES PERFORMANCE MEASURES INFORMATION – *Continued*		TOTAL ADULTS (A)	ADULTS (WELFARE) (B)	YOUTH (C)	DISLOCATED WORKERS (D)
9	EDUCATION STATUS	School Dropout				
0		Student *(High School or Less)*				
1		High School Graduate or Equivalent *(No Post High School)*				
2		Post High School Attendee				
3	FAMILY STATUS	Single Parent with Dependent(s) Under Age 6				
4		Single Parent with Dependent(s) Ages 6 through 17				
5	RACE/ETHNIC GROUP	White *(Not Hispanic)*				
6		Black *(Not Hispanic)*				
7		Hispanic				
8		American Indian or Alaskan Native				
9		Asian or Pacific Islander				
20	OTHER BARRIERS TO EMPLOYMENT	Limited English Language Proficiency				
21		Handicapped *(Adult/Youth)*				
22		Offender				
23	U.C. STATUS	Unemployment Compensation Claimant				
24		Unemployment Compensation Exhaustee				
	LABOR FORCE STATUS	Unemployed 1 - 14 Weeks of Prior 26 Weeks				
26		Unemployed Long-Term – 15 or More Weeks of Prior 26 Weeks				
27		Not in Labor Force				
28		Average Weeks Participated				
29		Youth Welfare Recipient				
	B. WAGE AND WELFARE DATA					
30		No. Terminees Entered Unsubsidized Employ *(With Preprogram Hourly Wage)*				
31		Average Hourly Wage in Last Job *(13 Weeks Preprogram)*				
32		Average Hourly Wage at Termination *(Terminees with Preprogram Hourly Wage)*				
33		Average Hourly Wage at Termination *(Terminees without Preprogram Hourly Wage)*				
34		Average Monthly Welfare Grant at Time of Eligibility Determination				

a. STATE/SDA NAME AND ADDRESS	b. GRANT NO.	c. REPORT PERIOD From · To	d. TYPE OF PROGRAM

LINE NO.	III PROGRAM COSTS	TOTAL ADULTS	ADULTS (WELFARE)	YOUTH	DISLOCATED WORKERS
		(A)	(B)	(C)	(D)
35	TOTAL PROGRAM COSTS				
	IV FOLLOWUP INFORMATION				
36	Potential Total Contacts				
37	Potential Sample Contacts				
38	Responses				
39	Total Employed (At Time of Contact)				
40	Total Employed (Sometime during First 13 Weeks after Termination)				
41	Average Hourly Wage (13 Weeks Preprogram)				
42	Average Hourly Wage (13 Weeks after Termination)				
43	Average Weeks Worked (13 Weeks Preprogram)				
44	Average Weeks Worked (13 Weeks after Termination)				
45	Average Hours Worked in Last Job (13 Weeks Preprogram)				
46	Average Hours Worked in Last Job (13 Weeks after Termination)				
47	Individuals Off Welfare (13 Weeks after Termination)				
48	Individuals with Reduced Welfare (13 Weeks after Termination)				
49	Average Welfare Grant Reduction (13 Weeks after Termination)				

REMARKS

SUBPART B

GENERAL INSTRUCTIONS FOR COMPLETING THE JTPA PERFORMANCE STANDARDS WORKSHEETS

Instructions for Completing the JTPA Annual Status Report.

a. SDA Grant Recipient's Name and Address

Enter the name and address of the SDA Grant Recipient.

b. SDA Number or Statewide

Enter this information as provided by the Governor.

c. Reporting Period

Enter in "From" the beginning date of the designated JPPA program year and enter in "To" the ending date of the program year.

d. Type of Program

Check the appropriate box(es) and specify as indicated. Program Types are:

II-A	(Adult and Youth Program)
III	(Dislocated Workers Program)
Other (Specify)	

e. Signature and Title (at bottom of the page)

The authorized official of the Governor signs here and enters his or her title.

f. Date Signed

Enter the date the report was signed by the authorized official.

g. Telephone Number

Enter the area code and telephone number of the authorized official.

General Information. The column breakouts are based strictly on age rather than on program strategy. For purposes of the ASR, the adult and adult welfare columns will include terminees age 22 years and older. The youth column will include terminees who were age 14-21 at the time of eligibility determination. The dislocated workers column may include adults and youth, as applicable.

Data reported should be based on information collected at the time of intake with two exceptions--immediate post program outcomes and followup data collected 13 weeks after termination. In order to facilitate the reporting of the immediate post program outcomes and the followup sections of the ASR, the Governor should consider requiring his/her SDAs to collect the 13 weeks pre-program information at the time of eligibility determination. (See Lines 30-34, 41, 43 and 45.) Refer to the Participant Record for further information.

CHARACTERISTICS INFORMATION OBTAINED ON AN INDIVIDUAL AT THE TIME OF ELIGIBILITY DETERMINATION FOR THE RECIPIENT'S JTPA PROGRAM SHOULD NOT BE UPDATED WHEN THE INDIVIDUAL TERMINATES FROM THE JTPA PROGRAM.

COLUMN HEADINGS

Column A Total Adults

This column will contain an entry for each appropriate item for all adult participants in Title II-A only.

Column B Adults (Welfare)

This column will contain an entry for each appropriate item for adult participants in Title II-A who were welfare recipients or whose family received cash payments under AFDC (SSA Title IV), General Assistance (State or local government), or the Refugee Assistance Act of 1980 (PL 96-212) at the time of JTPA eligibility determination. For performance standards purposes, exclude recipients of SSI (SSA Title XVI) from entries in Column B.

NOTE: Column B is a sub-breakout of Column A; therefore, Column B should be less than or equal to Column A, except for Lines 34 and 47-49.

Column C Youth

This column will contain an entry for each appropriate item for all youth participants in Title II-A only.

Column D Dislocated Workers

This column will contain an entry for each appropriate item for all participants in Title III who were determined to be eligible dislocated workers.

NOTE: All information regarding a given participant must be entered in the same column. Columns A, B, and C apply to Title II-A only. Column D applies to Title III only.

SECTION I - PARTICIPATION AND TERMINATION SUMMARY

Section I displays the program's accomplishments in terms of the total cumulative number of actual participants in the program and the number and types of terminations from the program, as of the end of the reporting period.

Entries for items I.A. and I.B are cumulative from the beginning of the program year through the end of the reporting period.

Item I.A. Total Participants

Enter the total number of participants who are or were in the program through the end of the reporting period, including both those on board at the beginning of the designated program year and those who have entered during the program year.

"Participant" means any individual who has: (1) Been determined eligible for participation upon intake; and (2) Started receiving subsidized employment, training, or services (except post-termination services) funded under the Act, following intake, except for an individual who receives only outreach and/or intake and assessment services.

Item I.B. Total Terminations

Enter the total number of participants terminated from the program for any reason from the beginning of the program year through the end of the reporting period. This item is the sum of Items I.B.1. through I.B.3.

"Termination" means the separation of a participant from a given title of the Act who is no longer receiving employment, training or services (except post-termination services) funded under that title. NOTE: Individuals may continue to be considered as participants for a period of 90 days after last receipt of employment or training funded under a given title.

Item I.B.1. Entered Unsubsidized Employment

Enter the cumulative number of terminees who entered (through the efforts of the subrecipient or otherwise) full- or part-time unsubsidized employment through the end of the reporting period. Unsubsidized employment means employment not financed from funds provided under the Act. (For JTPA reporting purposes, this term includes entry into the Armed Forces, entry into employment in a registered apprenticeship program, and terminees who became self-employed.)

Item I.B.1.a. Entered Registered Apprenticeship Program

Enter the cumulative number of terminees who entered registered apprenticeship programs following termination from the program. This item is a sub-breakout of Item I.B.1.

Item I.B.1.b. Entered Armed Forces

Enter the cumulative number of terminees who entered the Armed Forces following termination from the program. This item is a sub-breakout of Item I.B.1.

Item I.B.2. Youth Employability Enhancement Terminations

Enter the cumulative number of youth participants who were terminated under one of the Youth Employability Enhancements through the end of the report period. "Youth Employability Enhancement" means an outcome for youth, other than entered unsubsidized employment, which is recognized as enhancing long-term employability and contributing to the potential for a long-term increase in earnings and employment. Outcomes which meet this requirement shall be restricted to the following: (1) Entered Non-Title II Training; (2) Returned to Full-Time School; (3) Age 14-15 Completed Program Objectives; or (4) Completed Major Level of Education. NOTE: For reporting purposes, a youth shall not be counted in this item if he/she entered unsubsidized employment, and shall be counted in only one of these categories, even though more than one may have been achieved.

Item I.B.2.a. Entered Non-Title II Training

Enter the cumulative number of youth terminees who entered an employment/training program not funded under Title II of the JTPA. This item is a sub-breakout of Item I.B.2.

Item I.B.2.b. Returned to Full-Time School

Enter the cumulative number of terminees who returned to full-time school if, at the time of eligibility determination, the participant was not attending school and had not obtained a high school diploma or equivalent. This item is a sub-breakout of Item I.B.2.

Item I.B.2.c. Age 14-15 Completed Program Objectives

Enter the cumulative number of terminees who completed program objectives as defined in approved exemplary youth project plans if, at the time of entry, the participant was less than 16 years of age. This item is a sub-breakout of Item I.B.2.

Item I.B.2.d. Completed Major Level of Education

Enter the cumulative number of terminees who completed, during enrollment, a level of educational achievement which had not been reached at the time of entry. Levels of educational attainment are elementary, secondary, and post-secondary. This item is applicable only for those not in school at item of entry into the programs. This item is a sub-breakout of Item I.B.2.

NOTE: The sum of Items I.B.2.a. through I.B.2.d. in Column C should equal Item I.B.2., Youth Employability Enhancement Terminations, in that column.

Item I.B.3. Other Terminations

Enter the cumulative number of participants who were terminated for reasons other than those in Items I.B.1. and I.B.2.--both positive and negative--through the end of the reporting period.

SECTION II - TERMINEE PERFORMANCE MEASURES INFORMATION

Section II displays performance measures/parameters information. As indicated previously, characteristics information for terminated participants is as of the time of eligibility determination for the recipient's JTPA program. Other information is as specified (e.g., "Unemployed 1-14 Weeks of Prior 26 Weeks" means the cumulative number of terminees who were unemployed 1-14 weeks during the 26 weeks prior to eligibility determination).

References to items in the Participant Record are to the individual recordkeeping document to be provided by DOL in a Technical Assistance Guide (TAG). Governors have the option of using the record, as outlined in the TAG, or may develop any other record which meets the requirements of Section 629.35(c) and (d) of the JTPA Regulations.

Line Item Definitions and Instructions

Item II.A. Characteristics of Terminees

Sex

Line 1 Male
Line 2 Female

Distribute the terminees according to Sex. (Item A.20. of the Participant Record.) The sum of Lines 1 and 2 in each column should equal Item I.B. in that column.

Age

Line 3	14-15
Line 4	16-19
Line 5	20-21
Line 6	22-44
Line 7	45-54
Line 8	55 and Over

Distribute the terminees according to Age. (Item A.6. of the Participant Record.) The sum of Lines 3 through 8 in each column should equal Item I.B. that column.

Education Status

Line 9	School Dropout
Line 10	Student (High school or less)
Line 11	High School Grad. or Equiv. (No Post-High School)
Line 12	Post-High School Attendee

Distribute the terminees according to Education Status. (Item A.21. of the Participant Record.) The sum of Lines 9 through 12 in each column should equal Item I.B. that column.

Family Status

Line 13	Single Parent with Dependent(s) Under Age 6
Line 14	Single Parent with Dependent(s) Ages 6 thru 17

Distribute the terminees, by column, if either of the above Family Status classifications apply (Item A.10. of the Participant Record). NOTE: A terminee who is a single parent and has dependent children who are over and under age 6 should be included in the entry for Line 13 only.

Race/Ethnic Group

Line 15	White (Not Hispanic)
Line 16	Black (Not Hispanic)
Line 17	Hispanic
Line 18	American Indian or Alaskan Native
Line 19	Asian or Pacific Islander

Distribute the terminees according to the Race/Ethnic Groups listed above. For purposes of this report, Hawaiian Natives are to be recorded as "Asian or Pacific Islander" (Item A.22. of the Participant Record). The sum of Lines 15 through 19 in each column should equal Item I.B. in that column.

Other Barriers to Employment

Line 20 Limited English-Language Proficiency
Line 21 Handicapped (Adults/Youth)
Line 22 Offender

Enter the terminees, by column, for as many of the above Barriers to Employment in Lines 20 through 22 as apply (Item A.23. of the Participant Record).

Unemployment Compensation Status

Line 23 Unemployment Compensation Claimant
Line 24 Unemployment Compensation Exhaustee

Enter the terminees, by column, if either of the above Unemployment Compensation classifications apply (Item A.16. of the Participant Record).

Labor Force Status

Line 25 Unemployed: 1-14 Wks. of Prior 26 Wks.
Line 26 Unemployed: Long-term -- 15 or More Wks. of Prior 26 Wks.
Line 27 Not in Labor Force

Distribute the terminees, by column, if any of the Labor Force Status (Item A.17. of the Participant Record) classifications apply.

Line 28 Average Weeks Participated

Enter the average number of weeks of participation in the program for all terminees.

To calculate this entry: Count the number of days participated for each terminee, including weekends, from his/her date of entry into the program until his/her termination date. Divide this result by 7. This will give the number of weeks participated for the terminee. Sum all the terminees' weeks of participation and divide the result by the number of terminees, as entered (by column) in Item I.B.

Line 29 Youth Welfare Recipient

Enter the number of youth terminees who were welfare recipients or whose family received cash payments under AFDC (SSA Title IV), General Assistance (State or local government), or the Refugee Assistance Act of 1980 (PL 96-212) at the time of JTPA eligibility determination. For performance standards purposes, exclude recipients of SSI (SSA Title XVI) from entries for Line 29.

Item II.B. Wage and Welfare Data

Line 30 No. of Terminees Entered Unsubsidized Employment (For Terminees with Preprogram Hourly Wage)

Enter the number of terminees who entered unsubsidized employment at termination and who had a preprogram hourly wage (i.e., had held a job sometime during the 13 weeks prior to eligibility determination).

Line 31 Average Hourly Wage in Last Job (13 Weeks Preprogram)

Enter the average hourly wage for the last job held during the 13 weeks prior to eligibility determination for the total number of terminees shown on Line 30 above (by column).

To calculate this entry: Sum the hourly wage for the last job held during the 13 weeks prior to eligibility determination for all the terminees shown on Line 30 above (by column). Divide the result by the number of terminees shown on line 30 above (by column).

Line 32 Average Hourly Wages at Termination (For Terminees with Preprogram Hourly Wage)

Enter the average hourly wage at termination for the total number of terminees shown on Line 30 above (by column).

To calculate this entry: Sum the hourly wage at termination for all the terminees shown on Line 30 above (by column). Divide the result by the number of terminees shown on Line 30 above (by column).

Line 33 Average Hourly Wage at Termination (For Terminees with no Preprogram Hourly Wage)

Enter the average hourly wage at termination for terminees who entered unsubsidized employment and who had no preprogram hourly wage (i.e., had not held a job sometime during the 13 weeks prior to eligibility determination).

To calculate this entry: Subtract the entry for Line 30 in each column from the entry for Item I.B.1. of Section I in that column. This will give the number of terminees who had no preprogram hourly wage. Sum the hourly wage at termination for such terminees. Divide the result by the number of terminees who had no preprogram hourly wage.

Line 34 Average Monthly Welfare Grant (At Time of Eligibility Determination)

Enter the average monthly welfare grant for all terminees who were welfare recipients or whose family received cash payments under AFDC, General Assistance, or the Refugee Assistance Act of 1980 at the time of eligibility determination. For performance standards purposes, exclude recipients of SSI from entries in Column B.

To calculate this entry: Sum the average monthly welfare grant for each terminee who was a welfare recipient or whose family received cash payments, as defined above, at the time of eligibility determination. Divide the result by the number of terminees shown in Item I.B., Column B.

NOTE: Since followup is required for all terminees, it is strongly encouraged that the 13 weeks pre-program information be collected at the time of eligibility determination in order to facilitate the matching of followup data with required pre-program data. Refer to the Participant Record for further information.

SECTION III - PROGRAM COSTS

Line 35 Total Program Costs

Enter the total accrued expenditures, through the end of the reporting period, of the funds allocated to SDAs under Section 202(a) of the Act or otherwise distributed by the Governor to SDAs under Section 202(b)--Performance incentives--for the Title II-A program in Columns A and C, as appropriate, for all participants served. Enter the total accrued expenditures, through the end of the reporting period, of Title III funds received by the Governor under Section 301 of the Act in Column D only, for all participants served.

NOTE: Entries will be made to the nearest dollar. The ASR program cost data will be compiled on an accrual basis. If the recipient's accounting records are not normally maintained on an accrual basis, the accrual information should be developed through an analysis of the records on hand or on the basis of best estimates.

SECTION IV - FOLLOWUP INFORMATION

NOTE: This information must be obtained for all terminees, if the terminee populations are not large enough to use sampling (see the next section for further details), by means of participant contact methods only. Information required concerning terminees who had and did not have pre-program wages will be used for establishing further performance standards.

Line 36 Potential Total Contacts

Enter the total number of individuals for whom followup is required (if sampling is not used) and whose followup period ends within the reporting period. Individuals who terminate during the previous reporting period, but whose followup period ended during the current reporting period, are included in the entry for Line 36.

Line 37 Potential Sample Contacts

When sampling is used, enter the number of individuals in the sample in Line 37. Otherwise, enter zero for this line. (See the following section for the appropriate sample sizes.)

Line 38 Responses

Enter the number of individuals (of those entered in Lines 36 or 37, as appropriate) for whom all required followup information has been obtained.

Line 39 Total Employed (At Time of Contact)

Enter the number of individuals who were in unsubsidized employment at the time of contact (13 weeks after termination).

Line 40 Total Employed (Sometime During the First 13 Weeks after Termination).

Enter the number of individuals who were at time of contact, or had been sometime during the 13 weeks after termination, in unsubsidized employment.

Line 41 Average Hourly Wage (13 Weeks Preprogram)

Enter the average hourly wage for the last job held, if any, during the 13 weeks prior to eligibility determination for individuals who terminated during the report period, and for whom followup responses have been obtained (see entry for Line 40).

To calculate this entry: Sum the last hourly wage for the last job held during the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40 (by column). Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no preprogram wage, enter zero in the summation.

Line 42 Average Hourly Wage (13 Weeks after Termination)

Enter the average hourly wage for individuals who were, or had been, in unsubsidized employment sometime during the first 13 weeks after termination, who terminated during the report period, and for whom followup responses have been received (see entry for Line 40).

To calculate this entry: Sum the last hourly wage for the last job held during the 13 weeks after termination for each of the individuals shown in the entry for Line 40 (by column). Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 43 Average Weeks Worked (13 Weeks Preprogram)

Enter the average number of weeks worked in the 13 weeks prior to eligibility determination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of weeks worked in the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no pre-program wage, enter zero in the summation.

Line 44 Average Weeks Worked (13 Weeks after Termination)

Enter the average number of weeks in the 13 weeks after termination during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of weeks worked in the 13 weeks after termination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 45 Average Hours Worked - Last Job (13 Weeks Preprogram)

Enter the average number of hours worked during a week for the last job held during the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of hours usually worked during a week for the last job held during the 13 weeks prior to eligibility determination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column). If the individual had no pre-program wage, enter zero in the summation.

Line 46 Average Hours Worked - Last Job (13 Weeks after Termination)

Enter the average number of hours worked during a week for the last job held during the 13 weeks after termination for all individuals shown in the entry for Line 40 who terminated during the report period, and for whom followup responses have been obtained.

To calculate this entry: Sum the total number of hours usually worked during a week for the last job held during the 13 weeks after termination for each of the individuals shown in the entry for Line 40. Divide that result by the total number of individuals shown in the entry for Line 40 (by column).

Line 47 Individuals Off Welfare (13 Weeks After Termination)

Enter the number of individuals who were welfare recipients at the time of termination from the program, and who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination, and who were no longer welfare recipients.

Line 48 Individuals with Reduced Welfare (13 Weeks After Termination)

Enter the number of terminees, who were welfare recipients at the time of termination from the program, and who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination, and who were receiving reduced welfare grants.

Line 49 Average Welfare Grant Reduction (13 Weeks After Termination)

Enter the total reduction in the monthly welfare grant(s) 13 weeks after termination for all individuals off welfare and all those receiving reduced grants who entered unsubsidized employment at termination or were employed sometime during the 13 weeks after termination.

To calculate this entry: Sum the monthly grant reduction for each terminee off welfare or whose grant has been reduced (see entries for Lines 47 and 48). Divide this result by the total number of terminees included in the entries for Lines 47 and 48.

NOTE: Again, it is strongly encouraged that all information requested concerning pre-program experience be collected for all participants at the time of eligibility determination in order to facilitate the matching of followup data to required pre-program data.

V. USE OF SAMPLING TO OBTAIN FOLLOWUP INFORMATION

As indicated in the reporting instructions, the necessary participant followup information for all adult (AD) terminees, adult welfare (WR) terminees, and/or dislocated worker (DW) terminees, may be based on an annual sample drawn at random. Where sampling is used to obtain this information, SDAs or States will be expected to establish a system which provides accurate and reliable data that are representative of the followup universe. Consequently, it is necessary to have a system which ensures consistent random identification of sample participants throughout the performance period. Furthermore, the system must be structured to permit the matching of intake records with termination and followup records to produce the appropriate preprogram, termination, and postprogram data that must be reported for the sample population. In addition, the system should facilitate prompt contact of sample participants once their followup period is completed (i.e., 13 weeks after date of termination). This will necessitate access to current participant locater information. It is, therefore, important for SDAs or States to update locater information at time of termination for each participant who will be in the sample. This should include the participant's address and telephone number, as well as telephone numbers of relatives, friends, and/or neighbors. Often times participants change residence after terminating from the program. Additional contact information will be extremely helpful in locating individuals in this instance.

However, the use of sampling will depend on whether the respective terminee populations are large enough to provide estimates which meet minimum standards of statistical precision and confidence. These minimum standards require a sample which provides estimates that have a 95 percent confidence level and an expected error of no more than + 10 percent. In addition, SDAs or States that choose to sample should design their efforts to achieve a minimum response rate of 70 percent.

Based on national estimates of means and standard deviations of earnings and welfare payments from the Continuous Longitudinal Manpower Survey (CLMS), the following sample sizes will be necessary to meet the appropriate statistical specifications:

AD terminees -- 296
WR terminees -- 321
DW terminees -- 321

If the number of individuals for whom followup is required and whose followup period ends within the reporting period is less than the required sample sizes, sampling cannot be used to obtain participant followup information. In such cases, followup information must be obtained for all the appropriate terminees.

Otherwise, the sample sizes noted above are adequate to provide acceptable estimates within the minimum sampling standards for all terminee populations.

The required sample sizes shown above assume that independent "AD terminees", "WR terminees", and "DW terminees" samples will be drawn randomly. In order to select terminees for followup, first compute the proportion of terminees to be sampled as follows:

(1) For adult terminees, divide 296 by the number of terminations which are expected to occur during the program year.

(Example: assume an SDA expects 1500 terminations during the year; (296/1500 X 100 = 20%).)

(2) For welfare terminees, divide 321 by the number of welfare terminees expected.

(Example: assuming the SDA above expects 60 percent of the 1500 terminations to have been receiving welfare at entry: 321/(.6 X 1500) X 100 = 36%).)

(3) For dislocated worker terminees, divide 321 by the number of terminations which are expected to occur during the program year.

(Example: assuming a State expects 2000 terminations during the year; (321/2000 X 100 = 16%.)

The above examples assume that independent "AD terminees", "WR terminees", and "DW terminees" samples will be drawn. That may not be wholly necessary since "WR terminees" appearing in the "AD terminees" sample could also be included in the "WR terminees" sample.

Once the proportions are determined, a table of random numbers or other random selection techniques must be used to select the terminees who will be sampled. Terminees comprising the sample should be "flagged" at the time of termination and followup information should be obtained 13 weeks after termination.

DEFINITIONS OF TERMS NECESSARY FOR COMPLETION OF REPORTS

EDUCATION STATUS --

SCHOOL DROPOUT -- An individual who is not attending any school and has not received a high school diploma or a GED Certificate.

STUDENT (high school or less) -- An individual who is enrolled in an elementary or secondary school (including elementary, junior, and senior high school or equivalent), or is between school terms and intends to return to school.

HIGH SCHOOL GRADUATE OR EQUIVALENT (no post-high school) -- An individual who has received a high school diploma or GED Certificate, but who has not attended any post-secondary vocational, technical, or academic school.

POST-HIGH SCHOOL ATTENDEE -- An individual who is attending, or has attended, a post-secondary vocational, technical, or academic school.

HANDICAPPED INDIVIDUAL -- Refer to Sec. 4(10) of the Act. Any individual who has a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment. NOTE: This definition will be used for performance standards purposes, but not for program eligibility determination (Sec. 4(8)(E).

LABOR FORCE STATUS --

EMPLOYED -- (a) An individual who, during the 7 consecutive days prior to application to a JTPA program, did any work at all: (i) as a paid employee; (ii) in his or her own business, profession, or farm, or (iii) worked 15 hours or more as an unpaid worker in an enterprise operated by a member of the family; and (b) an individual who was not working, but has a job or business from which he or she was temporarily absent because of illness, bad weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the employer for the time off, and whether or not seeking another job. (This term includes members of the Armed Forces who have not been discharged or separated; participants in registered apprenticeship programs; and self-employed individuals.)

UNEMPLOYED -- An individual who did not work during the 7 consecutive days prior to application to a JTPA program, who made specific efforts to find a job within the past 4 weeks prior to application, and who was available for work during the 7 consecutive days prior to application (except for temporary illness).

NOT IN LABOR FORCE -- A civilian 14 years of age or over who is not classified as employed or unemployed. (This term includes persons who never worked at a full-time job lasting 2 weeks or longer and "discouraged workers", who have been and are no longer actively seeking employment.)

LIMITED ENGLISH LANGUAGE PROFICIENCY -- Inability of an applicant, whose native language is not English, to communicate in English, resulting in a job handicap.

OFFENDER -- Refer to Sec. 4(17) of the Act. Any adult or juvenile who is or has been subject to any stage of the criminal justice process for whom services under this Act may be beneficial or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

SINGLE PARENT -- A single, abandoned, separated, divorced or widowed individual who has responsibility for one or more dependent children: (1) Under Age 6; or (2) Ages 6 through 17.

UC CLAIMANT -- Any individual who has filed a claim and has been determined monetarily eligible for benefit payments under one or more State or Federal unemployment compensation programs, and who has not exhausted benefit rights or whose benefit year has not ended.

UC EXHAUSTEE -- Any individual who has exhausted his unemployment compensation benefits (not including Extended, Additional State, or Federal Supplemental Benefits) for which he has been determined monetarily eligible.

SUBPART C

A GUIDE FOR DESIGNING AND IMPLEMENTING A FOLLOWUP SYSTEM

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SUBPART C
A GUIDE FOR DESIGNING AND IMPLEMENTING A FOLLOWUP SYSTEM

I. INTRODUCTION

POST-JTPA INFORMATION REQUIRED TO ESTABLISH LONG-TERM MEASURES

The Congress has determined that criteria for measuring the return on investment in human capital must be developed. That basic return on investment is to be measured by the increased employment and earnings of participants and the reduction in welfare dependency. Therefore, a followup system must be designed which captures information on the participants' post-JTPA labor market experiences.

The Department considered several aspects of a followup system prior to making the ultimate decision to propose that followup data be collected on all adult, adult welfare, and dislocated worker terminees by means of participant contact only. Numerous discussions were held concerning:

- the cost of followup;
- the feasibility of using UI or welfare agency records in lieu of participant contact;
- whether to conduct followup on all terminees or just on those who were employed at the time of termination;
- what pre- and post-program time periods were most appropriate; and
- what data must be collected and reported.

The following represents the ultimate decisions which evolved from the referenced discussions.

II. USES OF FOLLOWUP DATA

FOLLOWUP DATA MAY BE USED TO EVALUATE PROGRAMS

The followup data information included in the reporting system will be used by the Department to establish longer-term performance standards (if OMB approves the reporting system). Governors or SDAs, however, may wish to match followup information with programmatic information in order to evaluate the effectiveness of the programs. For instance, followup information could be matched by program activity or service deliverer to see which activities or service deliverers have:

- the best placement results;
- the lowest cost per placement; and

- the highest average wage at placement.

Or, followup information could be matched by participant characteristics in order to:

- evaluate whether there is equity of access into the various program activities;
- determine if some types of participants consistently need more than one service strategy; and
- determine systematic practices in the community which may indicate employer preference towards some types of participants.

III. ACKNOWLEDGEMENTS

Much of the information contained in this subpart was extracted, and revised as appropriate, from a Technical Assistance Guide issued under CETA. The TAG was entitled "CETA: Management Information System Program; Designing and Implementing Local Follow-up Systems; Part I. Minimum Recommended System". The document was prepared for the Department by Messrs. Jeffrey J. Zornitsky, Glen Schneider and Martin Fleming, and Ms. Susan Crawford -- Policy and Evaluation Division of the Massachusetts Department of Manpower Development.

IV. RECOMMENDED MINIMUM TYPES OF DATA TO BE COLLECTED

GOVERNORS MAY CHOOSE TO CONDUCT STATEWIDE FOLLOWUP

Governors may choose to conduct, or subcontract for the conduct of, followup for all their SDAs. The advantage to this approach is that one can be sure that the data will be collected in a uniform manner and the cost to the JTPA programs, Statewide, would be decreased since all the SDAs would not have to incur start-up and maintenance costs.

On the other hand, while there is nothing to preclude SDAs from doing followup on their own for evaluation purposes, it is likely that the cost-savings resulting from a Statewide system would overshadow the benefit of each SDA conducting its own followup. It should be noted, however, that each of the sample sizes cited later applies at the SDA level. So, if there are six SDAs within a Statewide system, then for adults the minimum sample size is 6 x 296, with the 296 drawn from each SDA area in accordance with random sampling techniques.

FOLLOWUP INFORMATION OBTAINED BY PARTICIPANT CONTACT ONLY.

A. Types of Data Required

At a minimum, Governors or SDAs should use participant contact methods and report the following information separately on all adult, adult welfare, and dislocated worker terminees:

- Potential total contacts;
- Potential sample contacts (if applicable);
- Responses;
- Total employed at time of contact;
- Total employed sometime during the 13 weeks after termination;
- *The average hourly wage for the last job held during the 13 weeks prior to eligibility determination;
- The average hourly wage for the last job held during the 13 weeks after termination;
- *The average number of weeks worked in the 13 weeks prior to eligibility determination;
- The average number of weeks worked in the 13 weeks after termination;
- *The average number of hours usually worked during a week for the last job held during the 13 weeks prior to eligibility determination;
- The average number of hours usually worked during a week for the last job held during the 13 weeks after termination;
- The number of individuals off welfare 13 weeks after termination;
- The number of welfare terminees who were receiving reduced welfare grants 13 weeks after termination; and
- The average monthly welfare grant reduction 13 weeks after termination for all individuals off welfare and all those receiving reduced welfare grant(s).

The data elements marked with an asterisk could be collected on all applicants at the time of eligibility determination. This would reduce the number of followup questions which would have to be asked and the information would probably be better since it would be fresher in the minds of the applicants when they applied for entry into the program.

B. Sampling Specifications

MINIMUM SAMPLING SPECIFICATIONS

In many instances, an SDA or State would have terminee populations which would be of a sufficient size to provide estimates which meet minimum standards of statistical precision and confidence. To the extent possible, sampling is encouraged since it is less costly than contacting all terminees for which followup is required. These minimum standards require a sample which provides estimates that have a 95% confidence level and an expected error of no more than +10%. Further, SDAs or States which choose to sample shouTd design their efforts to achieve a minimum response rate of 70%. These minimun standards were developed to ensure the validity of the data which will be used to establish longer-term standards if OMB approves the proposed reporting system. The validity of the sampling data is questionable if these minimum standards are not achieved.

RANDOM IDENTIFICATION SYSTEM ESSENTIAL

Where sampling is used, SDAs or States should establish a system which provides accurate and reliable data which are representative of the followup universe. Consequently, it is necessary to have a system which ensures consistent random identification of sample participants throughout the performance period.

MATCHING OF RECORDS WITH FOLLOWUP INFORMATION

The system should be structured to permit the matching of intake records with termination and followup records to produce the appropriate pre-program, termination, and post-program data which must be reported for the sample population. Since followup is an ongoing process, the terminees' records should be "flagged" at time of termination to facilitate the prompt contact of sample participants once their followup period is complete (i.e., 13 weeks after date of termination).

MINIMUM SAMPLE SIZES

Based on national estimates of means and standard deviations of earnings and welfare payments from the Continuous Longitudinal Manpower Survey, the following sample sizes will be necessary to meet the above statistical specifications:

- Adult Terminees - 296
- Welfare recipient terminees - 321
- Dislocated worker terminees - 321

If the number of individuals for whom followup is required and whose followup period ends within the reporting period is less than the required sample sizes, sampling cannot be used to obtain participant followup information. In such cases, followup information must be obtained for all of the appropriate terminees.

There have been questions raised about what happens when the projection at the beginning of the year turns out to be inaccurate. First of all, if the sample size is exceeded before the end of the period, then it is important to continue the sampling for the full reporting period. This must be done to avoid any bias in the sample related to certain times of the year. The sample must be drawn randomly according to time as well as participants in order to be sufficiently representative. If the termination projection turns out to be short, then continue to collect the sample regardless. If an SDA or State is not reaching the 70% response rate during the year, it must undertake more intensive followup efforts until it reaches the 70%.

For the initial program period, followup information will not be used as the basis for rewards. Therefore, if the 70% response rate or minimum sample sizes are not met, then the process should simply be completed (i.e., do not go back and resample) and the experience used to more accurately manage sample sizes and response rates in the next year. It may be prudent to plan for higher than the minimum sample sizes to provide for a margin for error.

Once the proportions of adult, adult welfare, and dislocated worker terminees to be sampled are determined, a table of random numbers or other random selection techniques should be used to select the terminees who will be sampled.

For example, if 20% of the SDA's or State's terminees are needed for the sample, at the beginning of the year the SDA or State would select two of the numbers zero through nine from a random number table (e.g., five and seven). Throughout the year, every fifth and seventh terminees are selected for the sample. If two or more terminations are received at the same time--at least one of which is to be sampled--the SDA or State must select randomly from the group.

C. Sources of Local Followup Data

TWO PRIMARY
SOURCES OF
POST-PROGRAM DATA

There are two primary sources of data available for collecting information on participants' post-program experiences -- direct participant contact and institutional records, such as State Unemployment Insurance wage data and Federal, State, and local welfare agency records.

Institutional data sources were ruled out for the following reasons:

- UI wages data are not available consistently for every State;
- There is at least a quarter's time lag when one uses UI wage data;
- Available institutional data may not be recent enough or of sufficient scope to fulfill local decision-making needs; and
- Administrative arrangements for the sharing of information could be burdensome, and even costly, in some States.

Direct participant contact, however, provides substantial flexibility to program operators since it provides timely feedback into the planning process and it allows the potential inclusion of all types of terminees in the local followup efforts.

D. Participant Contact Methods

TELEPHONE SURVEY
RECOMMENDED

There are three methods for collecting participant-generated followup data -- telephone surveys, mail surveys, and personal interviews. Telephone surveys are recommended because they most favorably balance considerations of response rates, data quality, and costs. Research results analyzed by the Policy and Evaluation Division of the Massachusetts Department of Manpower Development show that:

- mail surveys have resulted in extremely low rates of response and have not been as cost efficient as telephone interviews;
- mail surveys have not allowed for adequate levels of quality control over the data; and
- personal interviews have produced comparatively high response rates as well as acceptable levels of data quality, but they are time consuming, costly, and somewhat impractical to conduct on a broad scale and ongoing basis.

E. Information Needed to Locate and Contact Former JTPA Participants

LOCATER INFORMATION NEEDED

To successfully use the telephone survey method to administer a followup questionnaire, key data elements are needed to locate and contact former JTPA participants. These data elements include: home telephone number; emergency telephone numbers, if available; home address; and if placed in a job, the employer's name, address and telephone number. Most of these data should be readily available in the participant files of the SDAs' MIS.

The high mobility of the JTPA population requires that this source of personal information be supplemented as well. At the point of termination, therefore, SDAs or States should conduct a brief exit interview with each participant to insure the availability of the latest personal contact information.

V. SETTING UP A FOLLOWUP SYSTEM

LOCATING AND CONTACTING PARTICIPANTS

A. The Location and Contact of Former Participants. Even with a concerted effort to update personal contact information, the participant location and contact process remains one of the more challenging and potentially time-consuming aspects of conducting a followup survey. The following procedures are recommended to form the basis of a standard location and contact process:

1. Mail introductory notification letters to terminees two weeks prior to the first followup contact attempt.

2. Telephone terminees and rotate calling times when initial calls are not successful.

3. Use local directories to obtain current phone numbers or addresses, including directory assistance, the "City Directory," or other city records, such as tax records and poll books.

4. Use the post office address correction service to obtain forwarding addresses of terminees who have relocated.

5. For program terminees who do not have telephones or have unlisted numbers or a disconnected phone, use a direct mail approach such as business reply cards.

6. When necessary, use such additional personal information as employers of those job placed, friends or relatives, emergency phone numbers from MIS records, progams operators, supportive service providers, and schools.

Because of differences in the size, location and participant population of SDAs or States, not all location and contact strategies are equally effective in all local areas. Consequently, the optimal mix of strategies or the intensity with which any particular approach should be pursued will vary. As a guide for gauging the success of location and contact efforts, an SDA or State should expect to achieve a response rate of at least 70% without exceeding budget limitations or time constraints of the standard 13 weeks followup period. As indicated before, the 70% response standard is to ensure the validity of the data so that it may be used for setting longer-term performance standards.

DATA COLLECTION LOGISTICS

B. Data Collection Logistics and Staffing. The SDA or State should address several logistical and organizational issues before implementing a followup system. Telephones must be made available for administering the survey instrument. Since much of the interviewing should be done after 5:00 p.m. and on weekends, facilities must be available during non-business hours. Because considerable quantities of information will be collected, SDAs or States are encouraged to use computer facilities for storing, processing, and analyzing data.

The SDA or State can adopt a variety of organizational approaches to operate the local followup system. However, regardless of the approach used, staff must fulfill the following responsibilities and functions:

MIS

1. Coordination of MIS Activities. For interviews to proceed in accordance with the 13 weeks followup schedule, the SDA or State must ensure the timely identification and retrieval of necessary participant files from the MIS. For example, SDAs or States which use automated systems could write a program to "flag" terminees for whom the 13 weeks have elapsed after termination. Then, the SDA or State could have the programmer provide a printout on a quarterly or monthly basis so that followup contacts could be made. SDAs or States which have to rely on manual MIS systems could set up a tickler file which contains the names of the terminees by the date they terminated. These files would be reviewed monthly or quarterly and followup contacts would be instituted accordingly.

Procedures must also be established for the organization of the 13 weeks preprogram information required to supplement both the followup data, and the contact information needed during the participant location process.

PARTICIPANT FOLLOWUP SURVEYS

2. Coordination and Implementation of Participant Followup Surveys. SDAs or States must provide the resources needed for oversight of all aspects of survey instrument administration. This includes organizing, training interviewers, identifying alternative location strategies, and supervising all quality control activities. Since these tasks require the coordination of many ongoing functions, they must be carried out in a well organized manner.

DATA ANALYSIS

3. Data Analysis and Report Writing. Once the requisite followup data are collected, SDAs or States must provide the resources necessary for both the processing, compilation, and analysis of the data, and for the writing of the evaluation report, if applicable.

In those cases where followup is used for evaluation purposes as well, SDAs or States should try to present their findings in a non-technical manner for use by staff and other interested members of the employment and training community. The report writers should be familiar with the objectives and operations of the SDA's or State's programs, and should understand basic analytical concepts and evaluative techniques.

PART C
NATIONALLY DEVELOPED ADJUSTMENT METHODOLOGY
(Instructions for Varying the
Performance Standards Using the Model)

I. BACKGROUND

GOVERNORS HAVE COMPLETE DISCRETION DURING FIRST NINE MONTHS

Section 106(a) permits the Governors to prescribe variations in the performance standards, within the parameters established by the Secretary, based on specific economic, geographic, and demographic factors in the State, the characteristics of the population to be served, and the types of services to be provided. The instructions issued by the Department on April 13, 1983, did not prescribe discrete limitations by which Governors could vary the standards. Rather, the Governors were given latitude in developing their methodology for adjusting the performance standards upward or downward for the initial program period.

Governors need to decide what adjustment methodology they will use to vary the performance standards in order to take into consideration their SDAs' specific local factors. This section describes a recommended methodology which uses an analytical model that systematically takes into consideration each SDA's local factors that bear on performance expectations. The model uses a necessarily extensive data base, and yet it is simple to apply. Although the model itself uses a complex analytical technique, the worksheet application of it employs simple arithmetic computations.

For the past three years, the Department has been developing and refining this model. Several approaches were considered by the JTPA Performance Standards Advisory Committee and Technical Workgroup. These groups were composed of a variety of State and local employment and training administrators and practitioners, academicians, and members from other interested and involved organizations. Group consensus was reached on the use of the methodology described in this section.

II. DESCRIPTION OF THE NATIONALLY DEVELOPED ADJUSTMENT METHODOLOGY [1]

SELECTION OF FACTORS IS CRUCIAL

The most crucial decision in developing an analytical model is the selection of the local factors to be included. The model should be an adequate reflection of activity or operations expected in a typical JTPA program. If the model makes sense intuitively, one can better accept the reliability of the ultimate results using empirical data. However, not all of the local factors which influence performance can be, or should be, accounted for in the model.

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[1] A technical paper is being prepared which will document the statistical work done during the development of the adjustment methodology. This paper will be made available upon request at a later date.

FACTORS HAD TO MEET THREE TESTS

In developing the model, many different types of factors were identified and examined; some were discarded. To be included in the model, each factor had to meet three tests:

- It had to make common sense;
- It had to be quantifiable; and
- Data for it had to be consistently available at the sub-State level.

REASONS FOR NOT INCLUDING CERTAIN FACTORS

The fifteen factors included in this model met these tests. Other factors were considered that did not. The following are some examples of those factors that were not included and the rationale behind the decision:

- Common sense dictates that management practices have a strong impact on performance; however this factor is difficult to quantify, so it was excluded.
- Likewise, it would make sense to assume that the extent of unionization would affect performance by driving up the wage rates and the cost per entered employment while lowering the entered employment rate. In this case, data was not available at the sub-State level.
- The extent of limited English speaking participants was expected to affect performance by increasing the cost per placement and decreasing the percent entering employment. This was not the case. The model showed that a large percent of limited English speaking participants would cause a decrease in the cost per placement and an increase in the number entering employment. Although the data was available, and it was quantifiable, it did not make sense to past Advisory Committee members. Members of the group felt that serving large numbers of particular participants with specific language barriers would result in more difficult placements and higher costs. Therefore, this factor was not included because it did not have face validity because of local bias.

- Finally, different program strategies (such as on-the-job training or classroom training) were not included as discrete factors because it was thought that program operators should be held accountable for programmatic decisions which are within their control, such as their choice of program services to be provided.

THIRD QUARTER FY 82 CETA DATA USED IN MODEL

For the purpose of constructing the adjustment model for the first nine month period, third quarter CETA data was used. The reasoning behind this decision was that it would be easier for one to relate nine months of historical experience to nine months of future operations. Statistically, there was very little difference between using three quarters or four quarters of data to construct the model.

The model includes selected terminee characteristics and economic data, as well as the average weeks of participation in the program. Terminee characteristics were selected for use rather than participant characteristics because JTPA is an outcome-oriented program. Consequently, the advisory groups believed that the model should be developed around those who have left the program since they form the bases for the outcome measures.

HOW THE MODEL WORKS

Once the local factors had been identified and the data had been collected, an analytical technique was used to determine the direction and magnitude of each local factor's influence on performance expectations for each measure. The advantage of the model is that it takes all SDAs' local factors into account simultaneously to explain a substantial portion of variations in performance among SDAs in a consistent and objective manner. The "weights" included in the model's equation show the direction (positive or negative) and magnitude of each local factor's influence on performance.

The model also determines the potential movement of the performance measure (e.g., entered employment rate) which can be expected to result from incremental changes in local factors. Such movement of the performance measure may be large, small, or non-existent depending on the strength of the relationship, and may be positive or negative in direction. The adjustment methodology refers to such movement as the anticipated local "impact on performance" for each factor. When all of the "impact on performance" results are combined, one is able to determine the "total effect on performance expectations" which all local factors have on a particular measure. Once the "total effect on performance expectations" result is applied (either added to or subtracted from the national departure point) one is able to predict what

NATIONAL DEPARTURE POINT

performance results should be expected for each measure if past performance is replicated. NOTE: The national departure point represents the actual national average performance level achieved by the CETA prime sponsors through the third quarter of FY 1982.

III. SUGGESTED METHODOLOGY FOR VARYING THE PERFORMANCE STANDARDS

If a Governor elects to use the nationally developed adjustment methodology to vary performance standards, there are five basic steps which must be followed when adjusting all of the standards (except the Welfare Entered Employment Rate which has slightly different steps that are described later in this section).

Attachment #1 (Subparts A, B, and C) to PART C contains Performance Standards Worksheets and instructions to assist in adjusting the performance standards.

Although the worksheets are not required, they simplify the calculation and adjustment processes. Nevertheless, regardless of whether one uses the worksheets, the following five basic steps must be followed if the nationally developed adjustment methodology is used:

FIVE BASIC CALCULATION STEPS

1. Calculate the SDA Factor Value (Column G on the worksheet) for each local factor using the following data sources:

    a. For the terminee characteristics, calculate the planned cumulative number of terminations through June 30, 1984, for each characteristic as a percent of the planned cumulative number of total terminations from the program.

    b. For the average weeks participated, obtain this number from the SDAs. This number will represent the planned number of weeks of participation for all terminees.

    c. Information concerning local economic factors should be obtained from this TAG (see Subpart D to PART C) if the SDA's geographical configuration is the same as the CETA prime sponsor during FY 1982. Otherwise, the local economic data should be obtained from the State Employment Security Agency (SESA) or the SDA.

F. LOCAL FACTORS	G. SDA FACTOR VALUES	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G MINUS H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	49.9	51.7		.03	

2. Subtract the National Factor Value (Column H) for each local factor from the appropriate SDA Factor Value (being careful with the signs).

F. LOCAL FACTORS	G. SDA FACTOR VALUES	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G MINUS H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	49.9	51.7	-1.8	.03	

3. Multiply the difference between the SDA Factor Value and the Corresponding National Factor Value by the appropriate weight (Column J) for each of the local factors. This provides the anticipated local "impact on performance" for the planned level for each factor which can be positive or negative (Column L).

F. LOCAL FACTORS	G. SDA FACTOR VALUES	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G MINUS H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	49.9	51.7	-1.8	.03	-.05

4. Add together each of the "impact on performance" results shown in Column K.

5. If the "total impact on performance" result is a positive number, add it to the National Departure Point. Conversely, if the "total impact on performance" result is a negative number, subtract it from the National Departure Point.

ADDITIONAL ADJUSTMENT OPTIONS

Once these steps have been completed, the adjustment process is finished. At this point, (Block M on the worksheet), the Governors have several options available to them.

- They may designate the adjusted number as the SDA's Performance Standard;

- They may further adjust the model results to take into consideration local circumstances not accounted for in the model as explained later in this section; and/or;

- They may apply a productivity improvement factor that responds to the Departmental expectation that JTPA performance will be better than its predecessor.

(A completed sample worksheet is included on the following page.)

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: Northeastern C.T.

B. SDA Number: 6

C. Performance Period: PY 1989

D. Type of Standard: ☒ Plan ☐ Recalculated

Date Calculated: June 26, 1989

E. Performance Measure: A Entered Employment Rate (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female	49.9	51.7	-1.8	.03	-.05
2. % 45-54 years old	3.8	4.5	-.7	-.56	+.39
3. % 55 years old & over	3.5	2.3	+1.2	.21	+.25
4. % Black	41.0	29.9	+11.2	-.07	-.78
5. % Hispanic	30.1	9.4	+20.7	.08	+1.66
6. % Other minority	5.1	4.9	+.2	.18	+.04
7. % Dropout	36.3	30.2	+6.1	-.08	-.49
8. % Handicapped	10.5	10.1	+.4	-.20	-.08
9. % UI claimant	1.5	7.0	-5.5	.26	-1.43
10. % Welfare recipient	72.9	30.7	+42.2	-.26	-11.03
11. Average wage for area (000)	14.1	15.3	-1.2	-.68	+.82
12. Unemployment rate	6.8	9.0	-2.2	-1.53	+3.37
				TOTAL ➤	-7.52

L National Departure Point (National Average Performance Level)	50.48	Q	
M Model-Adjusted Performance Standard	42.96		
N Parameters Limits	(+) 13 8.6 (-) 17 7.38		
O Governor's Adjustment Factor	(+) 5 % pts./$		
P SDA Performance Standard	47.96		

*Adjusted for estimated effects

IV. SUGGESTED METHODOLOGY FOR VARYING THE PERFORMANCE STANDARD FOR THE ADULT WELFARE ENTERED EMPLOYMENT RATE

An adequate data base was not available to enable the construction of an analytical model to use in varying the performance standards for the adult welfare entered employment rate. Therefore, an alternative methodology was developed which the Governors may use to vary this measure. In order to utilize this adjustment methodology, one will need to consult the economic data shown in Attachment #1 (Subpart D) to PART C of this TAG. The economic data provided is a display of the following information for each State and for each entity which was a CETA prime sponsor during FY 1982:

- The ratio of the welfare recipient entered employment to the total entered employment rate.

DETERMINING THE WELFARE ENTERED EMPLOYMENT RATIO

This ratio was determined using data from the Quarterly Summary of Participant Characteristics (QSPC) in the following manner:

- First, the welfare entered employment rate was computed (i.e., number of welfare recipients who entered employment as a percentage of the number of welfare recipients who terminated);
- Second, the total entered employment rate was computed (i.e., total number of individuals who entered employment as a percentage of the total number of individuals who terminated);
- Lastly, the welfare entered employment rate was divided by the total entered employment rate. The result of this last step is the welfare entered employment ratio.

In a few instances, the welfare entered employment ratio shown in Attachment #1 (Subpart D) is 1.00 or greater. This is possible in those cases where the prime sponsors (or States) had greater success in placing their welfare recipients (as a percent of the total welfare recipients terminated) than the total number of participants placed (as a percent of all individuals who terminated).

If the Governor chooses to use this adjustment methodology to vary the performance standard for the referenced measure, the economic data provided in Attachment #1 (Subpart D) must be used in conjunction with the Model-Adjusted Performance Standard for the adult entered employment rate (using the steps in Section III above), as follows:

**CALCULATION STEPS
FOR WELFARE
ENTERED
EMPLOYMENT RATE**

If the SDA's jurisdiction under JTPA is the same as that of the FY 1982 CETA prime sponsor:

- Multiply the appropriate prime sponsor ratio by the Model-Adjusted Performance Standard for the adult entered employment rate.
- For example, an SDA's "prime sponsor" welfare recipient entered employment ratio is .55.
- The SDA's Model-Adjusted Performance Standard for the adult entered employment rate is 50%.
- Fifty percent multiplied by .55 equals 27.5%.
- This represents the SDA's Performance Standard for the adult welfare entered employment rate unless the Governor then wishes to take into consideration exceptional circumstances not accounted for in the model or apply a productivity improvement factor to the results.

(Form Facsimile)

1.	Model-Adjusted Performance Standard for Adult Entered Employment Rate	50 %
2.	SDA (State) Welfare Entered Employment Rate Ratio	.55
3.	SDA Welfare Entered Employment Rate	27.5%
M.	Model-Adjusted Performance Standard	27.5%
N.	Parameters Limits	(+) 13 (-) 17 %
O.	Governor's Adjustment Factor	( ) %pts./$
P.	SDA Performance Standard	

If the SDA's jurisdiction is not the same as that of an FY 1982 CETA prime sponsor or is a new entity:

- Figure the Model-Adjusted Performance Standard for adult entered employment for this SDA.
- Multiply this by the appropriate State Welfare Entered Employment Rate Ratio.

- This represents the SDA's Performance Standard for the adult welfare entered employment rate unless the Governor wishes to take into consideration exceptional circumstances not accounted for in the model or apply a productivity improvement factor to the results.

V. EXAMPLES OF EXCEPTIONAL CIRCUMSTANCES FOR VARYING THE MODEL-ADJUSTED PERFORMANCE STANDARDS

EXCEPTIONAL CIRCUMSTANCES MAY JUSTIFY FURTHER VARIATIONS TO THE STANDARDS

As acknowledged earlier in this part, the analytical model does not include all factors which influence performance. Further, specific and exceptional local circumstances may occur which have a positive or a negative effect on an SDA's ability to achieve its Model-Adjusted Performance Standard for a particular measure, or measures. Therefore, the Governors have the discretion of raising or lowering the Model-Adjusted Performance Standard in order to take into consideration those circumstances or factors not accounted for in the model.

A list of circumstances has been developed which Governors may wish to consider if they desire to make further adjustments to the Model-Adjusted Performance Standards. These circumstances may support adjusting one or more of the standards for an SDA. The list is not all inclusive, but merely provides examples of the types of local factors which may have a significant positive or negative impact on performance.

Governors are encouraged to establish an outline of the criteria they will use in judging the merits of what situations will meet their definition of exceptional circumstances. These situations should be:

- new developments;
- truly exceptional; and
- not already accounted for in the model.

Furthermore, Governors are encouraged to request that SDAs provide documentation of these exceptional circumstances.

APPLICATION OF EXCEPTIONAL CIRCUMSTANCES

Governors should also decide whether to negotiate exceptional circumstances as part of the planning process or only at the end of the year. It is preferable to consider exceptional circumstances at both times. Governors will want to receive realistic plans for performance and SDAs will want performance goals established that are achievable. However, occurrences beyond the control of the SDA during the program year could greatly alter the ability to meet the standards for either the better or the worse. Therefore, adjustments may be equally appropriate at the end of the program year.

The following exceptional circumstances may be appropriate for further adjusting the Model-Adjusted Performance Standards:

- Special Circumstances
  - Recent or future local events of great magnitude which have or will render ETA-supplied economic data obsolete (e.g., a natural disaster or a major plant closing or opening occurring after the cut-off time period for ETA-supplied data);
  - Very extreme "planned" values for factors included in the model (i.e., planning a program with an average of only 6 weeks participation when the national average is over 29 weeks, or having a 30 percent unemployment rate or a 4 percent unemployment rate);

    NOTE: It is possible, although not likely, that a performance level could end up as an abnormally low number (for example, very low average weeks participated could result in extremely low "cost pers" for either youth or adults). While one cannot be sure that this will occur, reviews of past CETA program data show that extreme values from the national norm have caused unusual results.
- Local Factors Not Accounted for in the Calculation of the Standards
  - Significant levels of service to hard-to-place target groups not included in the analytical model such as ex-offenders or displaced homemakers;
  - A large pool of laid-off, unionized workers who have call-back rights;
  - Loss of publicly supported training facilities, such as vocational education or community colleges, in a local area which previously provided classroom training;

  - Classroom training facilities, or instruction, provided free by vocational education or community colleges.

- Other

  - National initiatives, such as service to refugees

It is important to reiterate that these adjustments should take into account only those factors not included in the model or unusual local conditions. Adjustments are not appropriately used as general negotiating tools to lower performance expectations.

DOCUMENTATION SUGGESTIONS

Governors should use this prerogative sparingly and exercise great caution in making adjustments because there are no objective ways to quantify the impact of most of these situations. Governors should ask SDAs to carefully document these situations and explain the rationale behind their estimation of the size and effect of the circumstances. It may be possible, for example, for the Employment Service to provide an assessment on the placement potential impact of a plant opening or closing.

STATEWIDE SDA

A Statewide SDA may have a similar difficulty in assessing and documenting the impact of exceptional circumstances. It is possible for an exceptional circumstance to occur in only one portion of the Statewide SDA. The Governor then has to determine the effect this occurrence will have on the overall Statewide SDA performance.

Once any exceptional circumstances are taken into consideration, if deemed appropriate, the adjusted number becomes the SDA Performance Standard for the affected measure unless the Governor wishes to apply a productivity improvement factor to the results. Once all adjustments have been made, the final adjusted number becomes the SDA Performance Standard.

VI. CALCULATION INSTRUCTIONS FOR PUERTO RICO, VIRGIN ISLANDS, GUAM, THE NORTHERN MARIANA ISLANDS, AMERICAN SAMOA, AND THE TRUST TERRITORY OF THE PACIFIC ISLANDS

The calculation steps described earlier in Section III should not be used for setting SDA standards for these jurisdictions since the influence of local factors cannot adequately measure these jurisdictions' unique circumstances. Standards should be set in these jurisdictions using national average performance levels as the Secretary's Standard for each measure. Such standards may be varied based on the influence of local economic, geographic, and demographic factors and the characteristics of participants in accordance with Section 106(e) of the Act.

ATTACHMENT #1

JTPA PERFORMANCE STANDARDS WORKSHEETS
(Completion Instructions)

The JTPA Performance Standards Worksheets (PSW) are provided to assist in completing the steps necessary to vary the performance standards using the nationally developed adjustment methodology. A separate PSW is provided for each of the performance measures.

To facilitate the calculation process required in order to use the adjustment methodology to vary the performance standards, appropriate information has been preprinted on each PSW. This information includes:

(1) Local Factors which influence performance potential (Column F);

(2) National Average Factor Values (Column H);

(3) Weights (Column J);

(4) National Departure Point (Block L); and

(5) Parameters Limits (Block M).

The remainder of this attachment is divided into four subparts:

Subpart A - Facsimiles of the Performance Standards Worksheets including appropriate preprinted information;

Subpart B - General Instructions for Completing the Performance Standards Worksheets;

Subpart C - Supplemental Instructions for Completing Selected Items on the Performance Standards Worksheets; and

Subpart D - Local Economic Data.

SUBPART A

FASCIMILES OF THE JTPA PERFORMANCE STANDARDS WORKSHEETS INCLUDING APPROPRIATE PREPRINTED INFORMATION

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name

B. SDA Number

C. Performance Period PY ____

D. Type of Standard
☐ Plan
☐ Recalculated

Date Calculated ____________

E. Performance Measure

A Entered Employment Rate (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NAT'L AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTORS ON PERFORMANCE EXPECTATIONS (I x J)
1. % Female		51.7		.03	
2. % 45-54 years old		4.5		-.56	
3. % 55 years old & over		2.2		.21	
4. % Black		29.9		-.07	
5. % Hispanic		9.4		.08	
6. % Other minority		4.9		.18	
7. % Dropout		30.2		-.08	
8. % Handicapped		10.1		-.20	
9. % UI claimant		7.0		.25	
10. % Welfare recipient		30.7		-.26	
11. Average wage for area (000)		15.3		-.68	
12. Unemployment rate		9.0		-1.53	
				TOTAL ➤	

L. National Departure Point (National Average Performance Level)	50.4%	Q	
M. Model-Adjusted Performance Standard			
N. Parameters Limits	(+) 13 (-) 17 %		
O. Governor's Adjustment Factor	( ) % pts./$		
P. SDA Performance Standard			

*Adjusted for estimated inflation

U.S. DEPARTMENT OF LABOR • Employment and Training Administration JTPA Performance Standards Worksheet		A. Service Delivery Area's Name	B. SDA NUMBER
C. Performance Period PY ____	D. TYPE OF Standard ( ) Plan ( ) Recalculated	DATE Calculated ____	E. PERFORMANCE MEASURE A Cost per Entered Employment (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female		51.7		22.04	
2. % 45-54 years old		4.5		96.66	
3. % 55 years old & over		2.2		-78.39	
4. % Black		29.9		4.19	
5. % Hispanic		9.4		-2.21	
6. % Other minority		4.9		-20.12	
7. % Dropout		30.2		17.73	
8. % Handicapped		10.1		9.00	
9. % UI claimant		7.0		-.66	
10. % Welfare recipient		30.7		49.43	
11. Average wage for area (000)		15.3		366.99	
12. Unemployment rate		9.0		323.27	
13. Average weeks participated		29.5		112.60	
				TOTAL ➤	

L. National Departure Point (National Average Performance Level)	$7,172.22	Q.	
M. Model-Adjusted Performance Standard			
N. Parameters Limits	(+) 20 (-) 25		
O. Governor's Adjustment Factor	% pts./$ ( )		
P. SDA Performance Standard			

*Adjusted for [illegible]

U.S. DEPARTMENT OF LABOR • Employment and Training Administration JTPA Performance Standards Worksheet	A Service Dulivery Area's Name	B SDA NUMBER

C Performance Period PY ____	D. TYPE OF Standard ☐ Plan ☐ Recalculated	DATE Calculated ____________	E PERFORMANCE MEASURE A Average Wage at Placement (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H NATL AVG. FACTOR VALUES	I DIFFERENCE (G minus H)	J. WEIGHTS*	K EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female		51.7		-.002	
2. % 45-54 years old		4.5		.001	
3. % 55 years old & over		2.2		-.015	
4. % Black		29.9		-.003	
5. % Hispanic		9.4		.000	
6. % Other minority		4.9		.007	
7. % Dropout		30.2		-.007	
8. % Handicapped		10.1		.003	
9. % UI claimant		7.0		.007	
10. % Welfare recipient		30.7		.001	
11. Average wage for area (000)		15.3		.109	
				TOTAL ➤	

L National Departure Point (National Average Performance Level)	$4.39	Q	
M Model-Adjusted Performance Standard			
N Parameters Limits	(+) 4 (-) 6 %		r
O Governor's Adjustment Factor	% pts./$ ( )		
P SDA Performance Standard			

*[illegible]

U.S. DEPARTMENT OF LABOR • Employment and Training Administration JTPA Performance Standards Worksheet	A. Service Delivery Area's Name	B. SDA NUMBER

C. Performance Period PY ______	D. TYPE OF Standard ☐ Plan ☐ Recalculated	DATE Calculated ______	E. PERFORMANCE MEASURE A Entered Employment Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female		47.2		.07	
2. % 14-15 years old		6.9		-.66	
3. % 16-19 years old		81.0		-.43	
4. % Black		33.7		-.02	
5. % Hispanic		10.9		-.05	
6. % Other minority		3.9		-.01	
7. % Dropout		23.7		.02	
8. % UI claimant		1.0		.62	
9. % Welfare recipient		32.1		-.18	
10. Average wage for area (000)		15.3		.02	
11. Unemployment rate		9.0		-.50	
				TOTAL ➤	

L. National Departure Point (National Average Performance Level)	28.7%	●	
M. Model-Adjusted Performance Standard			
N. Parameters Limits	(+) 28 (-) 50 %		
O. Governor's Adjustment Factor	% pts./$ ( )		
P. SDA Performance Standard	( )		

*[illegible]

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name

B. SDA NUMBER

C. Performance Period PY ______

D. TYPE OF Standard
☐ Plan
☐ Recalculated

DATE Calculated ______________

E. PERFORMANCE MEASURE

Positive Termination Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female		47.2		.18	
2. % 14-15 years old		6.9		.25	
3. % 16-19 years old		81.0		.21	
4. % Black		33.7		.03	
5. % Hispanic		10.9		.00	
6. % Other minority		3.9		.32	
7. % Dropout		23.7		-.27	
8. % UI claimant		1.0		.77	
9. % Welfare recipient		32.1		-.13	
10. Average wage for area (000)		15.1		-.68	
11. Unemployment rate		9.0		-.51	
				TOTAL ➤	

L. National Departure Point (National Average Performance Level)	76.7%	@	
M. Model-Adjusted Performance Standard			
N. Parameters Limits	(+) 11 (-) 10 %		
O. Governor's Adjustment Factor	X pts./$ ( )		
P. SDA Performance Standard			

*[illegible]

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U.S. DEPARTMENT OF LABOR • Employment and Training Administration **JTPA Performance Standards Worksheet**	A. Service Delivery Area's Name	B. SDA NUMBER

C. Performance Period PY ________	D. TYPE OF Standard (1) Plan (2) Recalculated	DATE Calculated ______________	E. PERFORMANCE MEASURE A Cost per Positive Termination (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORM. EXPECTATIONS (I times J)
1. % Female		47.2		-12.13	
2. % 14-15 years old		6.9		-57.02	
3. % 16-19 years old		81.0		-42.85	
4. % Black		33.7		-9.55	
5. % Hispanic		10.9		-1.73	
6. % Other minority		3.9		-40.97	
7. % Dropout		23.7		49.49	
8. % UI claimant		1.0		-44.45	
9. % Welfare recipient		32.1		5.00	
10. Average wage for area (000)		15.3		208.04	
11. Unemployment rate		9.0		87.04	
12. Average weeks participated		39.2		83.75	
				TOTAL ➤	

L. National Departure Point (National Average Performance Level)	$4,351.50	●	
M. Model-Adjusted Performance Std.			
N. Parameters Limits	(+) 30 (-) 31 %		
O. Governor's Adjustment Factor	% pts./$ ( )		
P. SDA Performance Standard			

*Adjusted for estimated inflation

U.S. Department of Labor. Employment and Training Administration JTPA Performance Standards Worksheet	A. Service Delivery Area's Name	B. SDA Number

C. Performance Period PY ________	D. Type of Standard ☐ Plan ☐ Recalculated	Date Calculated ______	E. Performance Measure Welfare Entered Employment Rate (Adult)

1. Model-Adjusted Performance Standard for the Adult Entered Employmnet Rate ________

2. SDA (State) Welfare Entered Employment Rate Ratio ________

3. Welfare Entered Employment Rate ________

M. Model-Adjusted Performance Standard ________

N. Parameters Limits (+) 13 (-) 17 %

O. Governor's Adjustment Factor % pts./$ ( ) ________

P. SDA Performance Standard ________

SUBPART C

SUPPLEMENTAL INSTRUCTIONS FOR CALCULATING SELECTED ITEMS ON THE JTPA PERFORMANCE STANDARDS WORKSHEETS

SUBPART B

GENERAL INSTRUCTIONS FOR COMPLETING THE JTPA PERFORMANCE STANDARDS WORKSHEETS

The following provides general instructions for completing the JTPA Performance Standards Worksheets (PSW) found in Subpart A of this attachment. These instructions include the sources of data and computation methods for most of the items on the worksheets. However, the sources of the data and the computation methods for certain entries on the PSW warrant a more detailed explanation and may be found in Subpart C of this attachment. Supplemental instructions for completing Column G (SDA Factor Values) are provided in Subpart C of this attachment.

INSTRUCTIONS FOR COMPLETING THE JTPA PERFORMANCE STANDARDS WORKSHEETS

A. Service Delivery Area's Name

Enter the Service Delivery Area's name.

B. SDA Number

Enter the JTPA number assigned by the Governor to the SDA.

C. Performance Period

Enter the program year for which the performance standard for each measure is being established. For the initial program period (October 1, 1983 - June 30, 1984), enter IPP.

D. Type of Standard/Date

Enter a check in the box next to the appropriate response (i.e., whether the standard is based on the SDA plan or is recalculated, at the Governor's discretion, based on the end-of-year performance). For Date, enter for "Calculated" the date on which the calculations were made.

E. Performance Measure

The name of the appropriate performance measure for which the SDA Performance Standard is being established is preprinted.

F. Column F - Local Factors

The local factors determined by the Secretary to have a measureable influence on SDA expected performance levels for each of the performance measures have been preprinted.

G. Column G - SDA Factor Values

Enter the SDA's values for each local factor listed in "Column F" which reflect the characteristics of the planned participants who will terminate during the program year and the planned average number of weeks of participation for all terminees. These planning values should be obtained from the SDAs. The characteristics of the terminees must be expressed as a percent of the total planned number of participants who will terminate during the program year. The average weeks participated will reflect the sum of the number of weeks participated for all terminees divided by the total number of terminees. Data reflecting local economic conditions for jurisdictions which were CETA prime sponsors during FY 1982 are provided in Subpart D of this attachment. These data should be used for the economic planning values in those cases where the SDA reflects the same geographical configuration as the CETA prime sponsor during FY 1982. If the SDA's geographical configuration is different than the CETA prime sponsor during FY 1982 or is a new entity, the economic planning values should be obtained from the State Employment Security Agency (SESA) or the SDA. To the extent possible, the ETA will provide updated local economic conditions for each SDA at a later date. (See Subpart C of this attachment for detailed completion instructions).

The Office of Performance Management has economic data available for the Average Wage for the Area and Unemployment Rate factors, by county and SMSA (Standard Metropolitan Statistical Area). Anyone interested in obtaining this information should contact:

ANNA C. HALL
U.S. Department of Labor
Employment and Training Administration
601 D Street, N.W., Room 9413
Washington, D.C. 20213
Telephone: (202) 376-7540

NOTE: Actual SDA Factor Values based on actual experience should be substituted for the planned SDA Factor Values if the performance standards are recalculated at the end of the performance period.

H. Column H -- National Average Factor Values

The national average data for the local factors shown in "Column F" have been preprinted.

I. Column I -- Difference

Enter the result of subtracting "Column H" from "Column G" for each local factor listed in "Column F".

J. Column J -- Weights

The appropriate weight for each local factor listed in "Column F" has been preprinted.

K. Column K -- Effect of Local Factors on Performance Expectations

Enter the net result of multiplying "Column I" by "Column J" for each local factor listed in "Column F".

L. Block L -- National Departure Point (National Average Performance Level)

The national departure point for each performance measure has been preprinted.

M. Block M -- Model-Adjusted Performance Standard

Enter the Model-Adjusted Performance Standard by adding the plus factor, or subtracting the minus factor, found in the "Total" box for "Column K" to the National Departure Point ("Block L").

N. Block N -- Parameters Limits

The appropriate Parameters Limits for each performance measure have been preprinted.

These limits were established by comparing third quarter FY 1982 actual performance to the model-predicted performance for all of the CETA prime sponsors. Then, for each measure, the limitations were set so that if SDAs perform in the same manner as the prime sponsors did through the third quarter of FY 1982, 25% of the SDAs would fail to reach the lower side of the limitations and 25% of the SDAs would exceed the higher side of the limitations.

O. Block O - Governor's Adjustment Factor

The Governor may take into consideration exceptional or mitigating circumstances or impose a productivity improvement factor and thereby further vary the Model-Adjusted Performance Standard ("Block M"). Any adjustment made by the Governor, positive or negative, should be entered in "Block O".

Examples: The SDA's jurisdiction experienced a major plant opening after the period for which the economic data was generated, therefore, the Governor adjusted the Model-Adjusted Performance Standard for the entered employment rate upward by 2.5% points. In addition, the Governor chose to impose a 5% point productivity factor on all SDAs in the State. The +7.5% points would be entered in "Block O".

The SDA's jurisdiction experienced a major plant opening after the period for which the economic data was generated, therefore, the Governor adjusted the Model-Adjusted Performance Standard for the cost per entered employment downward by $225. In addition, the Governor chose to impose a $500 productivity improvement factor in all SDAs in the State. The -$725 would be entered in "Block O".

NOTE: While no parameters were established for the initial program period, the Department is proposing to establish parameters in the future in the same manner as reflected above. Governors who wish to implement the proposed methodology, in its entirety, should be aware that any adjustments made by the Governors would have to fall within the Parameters Limits. Therefore, under the proposed system, any entry in "Block O" would be confined within the upper and lower limitation entries shown in "Block N".

P. Block P - SDA Performance Standard

The figure entered for the Governor's Adjustment Factor ("Block O") should be added to or subtracted from the Model-Adjusted Performance Standard ("Block M"). The result of this calculation is the SDA Performance Standard.

Examples:

If the Model-Adjusted Performance Standard for the entered employment rate is 50% ("Block M") and the Governor's Adjustment Factor is +7.5% points ("Block O"), then the SDA Performance Standard is 57.5%.

If the Model-Adjusted Performance Standard for the cost per entered employment is $4,500 and the Governor's Adjustment Factor is -$725, then the SDA Performance Standard is $3,775.

INSTRUCTIONS FOR COMPLETING THE JTPA PERFORMANCE STANDARDS WORKSHEET (WELFARE ENTERED EMPLOYMENT RATE)

A. **Block A through E**

Complete in accordance with the instructions provided for the JTPA Performance Worksheets (PSW) for the other six measures.

B. **Line 1 - Model-Adjusted Performance Standard for the Adult Entered Employment Rate**

Transfer the figure in "Block M" (Model-Adjusted Performance Standard) from the completed PSW for the adult entered employment rate measure.

C. **Line 2 - SDA (State) Welfare Entered Employment Rate Ratio**

Enter the ratio of the welfare entered employment rate to the total entered employment rate as shown on Attachment #1 (Subpart D). Where the jurisdiction of the SDA is the same as that of the CETA prime sponsor during FY 1982, the SDA's ratio should be entered on "Line 2". Where the jurisdiction of the SDA is not the same as that of a CETA prime sponsor during FY 1982 or is a new entity, the State's ratio should be entered on "Line 2".

D. **Line 3 - SDA Welfare Entered Employment Rate**

Multiply the SDA (State) Welfare Entered Employment Rate Ratio ("Line 2") by the Model-Adjusted Performance Standard for the Adult Entered Employment Rate ("Line 1") and post the results on "Line 3".

E. **Block M - Model-Adjusted Performance Standard**

Transfer the figure shown on "Line 3" above to "Block M".

F. **Blocks N through P**

Complete in accordance with the instructions for the JTPA Performance Standards Worksheets (PSW) for the other six measures.

SUBPART B

GENERAL INSTRUCTIONS FOR COMPLETING THE JTPA PERFORMANCE STANDARDS WORKSHEETS

SUBPART C
SUPPLEMENTAL INSTRUCTIONS FOR CALCULATING SELECTED ITEMS ON THE JTPA PERFORMANCE STANDARDS WORKSHEETS

The following provides detailed instructions regarding data sources and computations for entries on the JTPA Performance Standards Worksheets for Column G (SDA Factor Values).

Column G (SDA Factor Values) - The following describes the sources of the planning data to be used in computing the planned value for each local factor found to influence performance expectations. The factors are terminee characteristics, average weeks participated, and economic data. Data concerning the terminee characteristics and the average weeks participated should be obtained from the SDAs. Local economic data for jurisdictions which were CETA prime sponsors during FY 1982 are provided in Subpart D of this Attachment. If the SDA'S geographical configuration is different from the CETA prime sponsor during FY 1982 or is a new entity, the local economic data should be obtained from the State Employment Security Agency (SESA) or the SDA (if not already provided by the ETA). The specific entries for SDA Planned Values will be posted in "Column G" of the appropriate PSW.

1. Terminee Characteristics. Compute the percentages comprising the SDA Factor Values for terminee characteristics by utilizing the planned termination data for age, race, sex, public assistance status, educational status, etc., obtained from the SDAs. In computing the SDA Factor Values, the planned cumulative data through June 30, 1984 should be used. The basic formula for determining these entries is:

    - the planned cumulative number of terminations through June 30, 1984 for each characteristic as a percent of the planned cumulative number of total terminations from the program.

    NOTE: Actual SDA Factor Values based on actual cumulative data through June 30, 1984 should be used in lieu of the planned SDA Factor Values if the performance standards are recalculated at the end of the performance period. The basic formula for determining the actual SDA Factor Values entries is:

- the actual cumulative number of terminations through June 30, 1984 for each characteristic as a percent of the actual cumulative number of total terminations from the program.

EXAMPLE: SDA #1 submits a plan which contains the following planned characteristic data through June 30, 1984:

ADULT TERMINEE CHARACTERISTICS	PLANNED ADULT TERMINATIONS
Total	1,000
Males	501
Females	499
22 - 44 years	700
45 - 54 years	190
55 years and up	110
White	236
Black	412
Hispanic	301
American Indian or Alaskan Native	30
Asian or Pacific Islander	21
Post High School	300
Students (High School or Less)	0
Dropouts	250
High School Graduate (or Equivalent)	450
Handicapped	95
UI Claimants	100
Welfare Recipients	350

The SDA Factor Values which would be posted in "Column G" of the appropriate PSW for SDA #1 would be as follows:

LOCAL FACTORS	COMPUTATION	SDA PLANNED VALUES
% Female	499 ÷ 1,000	49.9
% 45-54 years	190 ÷ 1,000	19.0
% 55 years and up	110 ÷ 1,000	11.0
% Black	412 ÷ 1,000	41.2
% Hispanic	301 ÷ 1,000	30.1
% Other Minority	(30+21)÷ 1,000	5.1
% Dropouts	250 ÷ 1,000	25.0
% Handicapped	95 ÷ 1,000	9.5
% UI Claimants	100 ÷ 1,000	10.0
% Welfare Recipients	350 ÷ 1,000	35.0

Similar calculations as those shown above should be done in order to compute the SDA Factor Values for all of the terminee characteristics included as local factors in "Column F".

2. Average Weeks Participated. SDAs should provide to the Governor the planned average number of weeks of participation of all terminees. The planned Average Weeks Participated number should be entered in "Column G", SDA Factor Values.

3. Local Economic Conditions. The remaining local factors reflect SDA planning assumptions pertaining to economic conditions. The specific economic factors are:

   - Unemployment Rate

   - Average Wage for the Area

   NOTE: The Average Wage for the Area factor represents the annual average payroll per employee (i.e., per capita wage earnings). It reflects the total dollars paid out in a year divided by the number of employees. The data are published by the Bureau of Labor Statistics (BLS) based on information submitted by employers via the ES 202 concerning full and part-time employees covered by Federal and State unemployment insurance. The types of employees who are excluded from these employers' reports include: the majority of agricultural workers, members of the Armed Forces, railroad employees, domestics, self-employed individuals, and some employees of small, non-profit organizations.

   As previously stated, Subpart D of this Attachment provides local economic data pertaining to CETA prime sponsors during FY 1982. To the extent that the SDA's geographical configuration conforms to the CETA prime sponsor's geographical configuration, the planning data in Subpart D of this Attachment should be used. If the SDA's geograhical configuration is different from the FY 1982 prime sponsor's configuration or is a new entity, the SDA Factor Values for the economic factors should be obtained from the SESA or the SDA (if not already provided by the ETA). To the extent feasible, updated SDA economic planning data will be supplied by the ETA at a later date.

PERFORMANCE MEASURES CALCULATION FORMULAS - Use the following formulas in order to compute the performance measures listed below:

PERFORMANCE MEASURE APPLICABLE PROGRAMS(S)

(1) Entered Employment Rate Adult and Youth

$$\frac{\text{Planned Total Terminees who will Obtain Employment}}{\text{Planned Total Terminees}}$$

(2) Cost per Entered Employment Adult

$$\frac{\begin{array}{c}\text{Planned Total Expenditures,}\\ \text{including Administrative Costs}\end{array}}{\text{Planned Total Terminees who will Obtain Employment}}$$

(3) Average Wage at Placement Adult

Average Wage of all Terminees who
Entered Employment at Time of Termination

(4) Positive Termination Rate Youth

$$\frac{\begin{array}{c}\text{Planned Total Terminees who will:}\\ \text{(Obtain Employment) + (Enter non-Title II Training) +}\\ \text{(Return to Full-Time School) +}\\ \text{(Complete Program Objectives -- 14-15 Years Only) +}\\ \text{(Complete Major Level of Education)}\end{array}}{\text{Planned Total Terminees}}$$

(5) Cost Per Positive Termination Youth

$$\frac{\begin{array}{c}\text{Planned Total Expenditures,}\\ \text{including Administrative Costs}\end{array}}{\begin{array}{c}\text{Planned Total Terminees who will:}\\ \text{(Obtain Employment) + (Enter non-Title II Training) +}\\ \text{(Return to Full-Time School) +}\\ \text{(Complete Program Objectives -- 14-15 Years Only) +}\\ \text{(Complete Major Level of Education)}\end{array}}$$

SUBPART D

LOCAL ECONOMIC DATA

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	CONNECTICUT		0.81	16319	6.9
		BRIDGEPORT CONS	0.92	18295	7.8
		CITY OF HARTFORD	0.82	16434	6.5
		NEW HAVEN CONSORTIUM	0.64	14715	7.0
		STAMFORD CETA	0.91	18255	4.5
		CITY OF WATERBURY	0.94	14715	10.4
		BAL OF CONN	0.80	15206	7.0

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	MAINE		0.79	12708	8.6
		PENOBSCOT CONS	0.63	12604	8.4
		CUMBERLAND CNTY	1.08	13144	6.3
		MAINE CETA OFFICE	0.85	12566	9.4

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	MASSACHUSETTS		0.82	15089	7.9
		CITY OF BOSTON	0.68	17062	9.1
		EMMRDA	0.73	16358	6.2
		FALL RIVER CETA CONSORTM	0.80	13277	11.9
		NEW BEDFORD CONS	0.86	12777	12.6
		HAMPDEN CO MANPOWER CONS	0.75	13582	8.3
		WORCESTER CONSORTIUM	0.83	13950	8.6
		LOWELL CONS	0.87	16398	7.2
		CITY OF BROCKTON	0.79	17661	9.8
		MASS OFC MANPOWER AFFAIRS	0.88	14762	7.4
		PITTSFIELD	0.57	14079	8.0
		SALEM AREA E&T ADMIN	0.84	14236	7.0

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	NEW HAMPSHIRE		0.89	13269	7.4
		HILLSBOROUGH CNTY	1.19	14095	6.8
		BAL OF NEW HAMPSHIRE	0.73	12949	7.6

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	RHODE ISLAND		0.62	13678	10.2
		CITY OF PROVIDENCE	0.48	13579	11.3
		STATE OF RHODE ISLAND	0.56	13235	9.9

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
1	VERMONT		0.84	12983	6.9
		STATE OF VERMONT	0.84	12983	6.9

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
2	NEW JERSEY		0.78	16518	9.8
		ATLANTIC COUNTY CETA	0.68	15027	10.0
		BERGEN COUNTY CETA	0.76	16790	6.9
		BURLINGTON COUNTY CETA	0.64	14677	7.3
		CAMDEN COUNTY CETA	0.57	15429	7.3
		CITY OF CAMDEN CETA	0.86	15425	19.7
		CUMBERLAND COUNTY CETA	0.84	13909	16.4
		CITY OF ELIZABETH CETA	0.82	18585	13.4
		ESSEX COUNTY CETA	0.70	17350	7.0
		GLOUCESTER COUNTY CETA	0.94	14792	8.4
		HUDSON COUNTY CETA	1.02	16519	12.9
		JERSEY CITY CETA	0.93	16519	15.3
		MERCER COUNTY CETA	1.05	16287	6.7
		MIDDLESEX COUNTY CETA	0.35	17582	8.0
		MONMOUTH COUNTY CETA	1.01	14740	8.3
		MORRIS COUNTY CETA	0.60	17779	6.6
		CITY OF NEWARK CETA	0.67	17954	15.4
		OCEAN COUNTY CETA	0.81	12569	8.4
		PASSAIC COUNTY CETA	0.72	19755	9.1
		CITY OF PATERSON CETA	0.78	15795	15.9
		SOMERSET COUNTY CETA	0.47	17687	6.6
		CITY OF TRENTON CETA	0.98	16287	14.2
		UNION COUNTY CETA	0.82	18585	8.2
		NJ DEPT. OF LABOR & IND.	0.79	14298	9.5

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
2	NEW YORK		0.73	17092	8.6
		ALBANY CITY CETA	1.52	15130	7.6
		ALBANY COUNTY CETA	1.16	15130	5.6
		BROOME COUNTY CETA	0.68	15200	7.5
		CITY OF BUFFALO CETA	0.75	15377	16.9
		CHAUTAUQUA CETA CONSORTIA	0.62	13193	10.7
		CHEEKTOWAGA CONSORT CETA	0.75	15377	9.6
		CHEMUNG COUNTY CETA	1.09	13955	11.5
		DUTCHESS COUNTY CETA	0.72	16654	5.9
		ERIE COUNTY CETA	0.58	15377	10.3
		TOWN OF HEMPSTEAD CETA	0.48	15716	6.4
		JEFFERSON COUNTY CETA	0.79	13428	11.6
		MONROE COUNTY CETA	0.81	18467	4.6
		NASSAU COUNTY CETA	0.67	15716	5.4
		NIAGARA CO. MANPOWER DEPT	0.52	16044	14.2
		ONEIDA COUNTY CETA	0.72	13597	8.7
		ONONDAGA COUNTY CETA	0.91	15954	6.7
		ORANGE COUNTY CETA	0.88	13072	8.4
		OSWEGO COUNTY CETA	0.69	16935	9.0
		RENSSELAER COUNTY CETA	0.76	13067	7.3
		CITY OF ROCHESTER CETA	0.90	18467	10.1
		ROCKLAND COUNTY CETA	0.64	14456	5.8
		ST. LAWRENCE COUNTY CETA	0.74	15057	10.3
		SARATOGA COUNTY CETA	1.07	13003	7.2
		SCHENECTADY COUNTY CETA	0.82	17543	6.6
		SUFFOLK CO. CETA CONSORTM	0.62	14998	6.7
		CITY OF SYRACUSE CETA	0.89	15954	9.3
		ULSTER COUNTY CETA	1.03	13988	7.8
		WESTCHESTER COUNTY CETA	0.81	17376	4.9
		CITY OF YONKERS CETA	0.86	17376	7.0
		NY DEPT OF LABOR - CETA	0.79	14185	9.7
		CITY OF NEW YORK CETA	0.82	18964	9.6

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
3	DELAWARE		0.66	16354	8.5
		STATE OF DELAWARE	0.62	12971	8.0
		CITY OF WILMINGTON	1.03	17644	11.1

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
3	DISTRICT OF COLUMBIA		0.41	20699	10.6
		DISTRICT OF COLUMBIA	0.41	20699	10.6

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
3	MARYLAND		0.81	15147	8.4
		STATE OF MARYLAND	0.73	12945	10.0
		BALTIMORE CONSORTIUM	0.83	15086	9.8
		MONTGOMERY COUNTY MD	0.61	16577	3.9
		PRINCE GEORGES CNTY	0.95	15008	5.8
		WESTERN MARYLAND CONSORTI	0.66	14336	14.3
		BALTIMORE COUNTY	0.80	15687	10.2
		FREDERICK COUNTY	0.77	12961	10.6

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
*	PENNSYLVANIA		0.83	15607	10.9
		LEHIGH NNPJ CONSORTIUM	0.76	15637	11.2
		BUCKS COUNTY	0.69	15097	9.8
		CHESTER COUNTY	0.63	15968	8.4
		DELAWARE COUNTY	0.85	15978	8.1
		MONTGOMERY COUNTY PA	0.88	16495	7.8
		CITY OF PHILADELPHIA	0.99	17046	9.8
		BERKS COUNTY	0.68	14653	10.8
		LACKAWANNA COUNTY	0.97	12369	11.3
		CITY OF SCRANTON	0.55	12369	9.7
		LUZERNE COUNTY	0.63	12848	11.9
		SCHUYLKILL EMPLOY & TRAIN	0.63	11718	12.7
		ERIE CITY	0.66	15202	12.8
		ERIE COUNTY	0.65	15202	11.5
		ALLEGHENY COUNTY	0.83	17414	11.4
		CITY OF PITTSBURGH	0.86	17414	10.2
		BEAVER COUNTY	0.79	14713	17.3
		WASHINGTON COUNTY	0.99	16105	13.0
		WESTMORELAND COUNTY	0.69	15513	13.8
		TRI-COUNTY CONSORTIUM	0.58	15738	14.8
		FAYETTE COUNTY	0.53	13354	14.0
		LAWRENCE COUNTY	0.48	14298	16.2
		MERCER COUNTY CONSORTIUM	0.83	15486	14.3
		SOUTHERN ALLEGHENIES	0.56	13919	16.0
		SUSQUEHANNA CONSORTIUM	0.88	15046	6.8
		YORK COUNTY	1.02	14922	10.9
		LYCOMING CONSORTIUM	0.71	13765	13.7
		FRANKLIN COUNTY	0.88	13985	11.8
		STATE OF PENNSYLVANIA	0.74	11502	12.1
		CENTRE COUNTY	0.49	13709	9.5
		NORTHUMBERLAND COUNTY	0.78	13186	12.7
		LEBANON COUNTY	0.74	13542	10.7
		LANCASTER COUNTY	0.85	13752	7.4

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
3	VIRGINIA		0.66	14498	7.7
		PENINSULA CONSORTIUM	0.73	13858	6.7
		STAMA CONSORTIUM	0.66	13220	7.1
		RICHMOND MNPW CONSORTIUM	0.77	15310	7.0
		HENRICO CONSORTIUM	0.77	14589	5.3
		FIFTH DISTRICT CONSORTIUM	0.76	13500	8.0
		ARLINGTON COUNTY	0.78	21469	5.2
		NORTHERN VIRGINIA CONSORT	0.74	16405	3.8
		PRINCE WILLIAM COUNTY	0.86	14518	4.2
		CITY OF ALEXANDRIA	0.65	15977	7.8
		STATE OF VIRGINIA	0.58	13387	10.4
		CITY OF PORTSMOUTH	0.63	15398	8.9

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
3	WEST VIRGINIA		0.69	15748	13.9
		STATE OF WEST VIRGINIA	0.69	15748	13.9

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	ALABAMA		0.69	13986	14.4
		ALABAMA OFC OF EMP & TRNG	0.67	12970	15.4
		BIRMINGHAM CONSORTIUM	0.70	15564	13.8
		HUNTSVILLE MADISON CO CSR	0.70	15961	10.7
		MOBILE CONSORTIUM	0.91	14150	13.6
		SJT ELMOR MONT MNPWR CONS	0.69	13319	11.7
		TUSCALOOSA CO COMMISSION	0.89	13387	12.6
		ETOWAH COUNTY COMMISSION	0.27	15589	20.5

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	FLORIDA		0.79	13833	8.2
		STATE OF FLA OFC OF GOV	0.78	13886	9.2
		ALACHUA CO BD OF COMMRS	0.77	12221	4.3
		BREVARD CT BD OF CTY COMM	0.66	15647	7.4
		BROWARD ETA	0.84	14192	6.6
		SO FLA EMP AND TRAIN CSM	0.76	15270	10.0
		HEARTLAND EMP AND TRN CSM	0.72	12932	13.6
		LAKE CO BOARD OF CO COMM	0.55	10795	11.7
		LEE COUNTY BD OF COMM	0.80	12477	7.4
		LEON GADSDEN CONSRATIUM	0.89	12581	5.2
		N E CONSORTIUM	1.20	14566	6.8
		OKALOOSA CO BD OF COMM	0.78	12470	7.8
		ORANGE CO ORLANDO CONSOR	0.87	14183	6.8
		MANATEE CO BD OF COMM	0.85	11877	7.6
		MARION CO BD OF COMM	0.28	11641	8.6
		PALM BEACH CO BD OF COMM	0.61	14576	7.8
		PASCO CO BD OF CO COMM	0.87	11188	8.2
		SEMINOLE CO BD OF COMM	0.59	12343	6.6
		PINELLAS CO ST PETE CSM	0.86	12948	6.5
		CITY OF TAMPA	0.92	13978	8.5
		HILLSBOROUGH COUNTY	0.72	13878	7.2
		VOLUSIA COUNTY COUNCIL	0.58	11518	6.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	GEORGIA		0.69	14280	7.8
		STATE OF GA OFC OF GOV	0.65	12764	8.3
		CSRA MANPOWER CONSORTIUM	0.66	12583	8.5
		CITY OF ATLANTA	0.84	16632	8.9
		COLUMBUS EMP AND TRNG ADM	0.71	12469	8.0
		DEKALB COUNTY	0.76	15748	5.2
		FULTON COUNTY	0.97	16985	7.4
		MIDDLE GEORGIA CONSORTIUM	0.51	14332	7.1
		SAVANNAH CHATHAM MPR CSM	0.96	14333	8.0
		GWINNETT CO BD OF COMMS	0.91	15599	5.6

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	KENTUCKY		0.55	14561	10.6
		BLUEGRASS MPR CONSORTIUM	0.93	14461	.1
		LOUISVILLE-JEFFERSON CONS	0.48	15946	11.7
		COMMONWEALTH OF KENTUCKY	0.76	13580	10.8
		EASTERN KENTUCKY CEP INC	0.39	16312	14.2

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	MISSISSIPPI		0.52	12569	11.0
		ST OF MISS GOV OFC ED FTR	0.51	12260	11.9
		JACKSON MPWR CONSORTIUM	0.72	13903	7.4
		GULF COAST CONSORTIUM	0.85	12522	9.1

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	NORTH CAROLINA		0.48	13874	9.0
		B O S NORTH CAROLINA CPC	0.45	12031	10.1
		ALAMANCE CO BD OF COMM	1.85	11631	11.2
		BUNCOMBE CO BD OF COMM	0.59	12748	8.2
		CUMBERLAND CO BD OF COMM	0.46	12483	8.4
		CITY OF CHARLOTTE	0.54	19599	6.0
		CITY OF DURHAM ETD	0.72	15368	4.7
		GASTON COUNTY	0.34	12927	9.3
		GREENSB GUILFORD MPT CONS	0.56	14353	7.4
		CITY OF RALEIGH	0.79	13917	5.3
		ROBESON CO BD OF COMM	0.69	10517	14.7
		WAKE CO BOARD OF COMM	0.29	13917	3.7
		CITY OF WINSTON-SALEM CSP	0.69	16160	7.1
		DAVIDSON CO MANPOWER DEPT	0.42	11766	10.5

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	SOUTH CAROLINA		0.79	13041	10.8
		OFC OF GOV STATE OF SC	0.79	13041	10.8

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JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
4	TENNESSEE		0.65	13969	11.8
		STATE OF TENN DEPT OF E S	0.68	12757	14.3
		CITY OF CHATTANOOGA	0.64	14915	10.8
		MEMPHIS-SHELBY COUNTY CSM	0.69	15174	9.6
		HAMILTON COUNTY	0.59	14915	8.6
		KNOXVILLE-KNOX CO CDASA	0.91	13544	8.3
		NASHVILLE DAVIDSON COUNTY	0.66	14598	7.1
		SULLIVAN COUNTY	0.22	15916	10.3

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	ILLINOIS		0.79	17017	11.3
		CITY OF CHICAGO	0.80	18369	11.7
		COOK COUNTY	0.81	18369	9.5
		DUPAGE COUNTY	0.78	16523	8.2
		LAKE COUNTY	0.73	16206	8.5
		MACON COUNTY	0.68	17392	15.6
		MCHENRY COUNTY	0.19	14183	10.8
		ROCK ISLAND COUNTY	0.67	19843	16.5
		TAZEWELL COUNTY	0.63	22119	14.2
		LASALLE COUNTY	0.74	15065	15.5
		ROCKFORD CONSORTIUM	0.59	16791	16.5
		CHAMPAIGN COUNTY CNST.	0.82	12902	6.6
		WILL GRUNDY CONSORTIUM	0.70	16767	12.8
		SANGAMON CO. COURTHOUSE	0.73	14485	7.8
		MADISON COUNTY CONSORTIUM	0.65	16432	12.9
		ST. CLAIR CONSORTIUM	0.79	14262	11.7
		PEORIA CONSORTIUM	0.91	17573	14.3
		SHAWNEE CONSORTIUM	0.33	11971	18.3
		STATE OF ILLINOIS	0.69	14498	12.5
		MCLEAN COUNTY	0.58	14983	7.9
		KANE COUNTY	0.65	15027	12.3

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	INDIANA		0.66	15662	11.9
		CITY OF GARY	0.80	18969	24.2
		CITY OF HAMMOND	0.65	18969	15.4
		LAKE COUNTY	0.47	18969	12.6
		ELKHART COUNTY	0.54	14868	10.3
		TIPPECANOE COUNTY	0.58	15101	7.4
		MADISON COUNTY	0.72	17311	16.2
		VIGO COUNTY	1.01	14744	11.1
		CITY OF INDIANAPOLIS	0.56	17063	10.2
		LAPORTE COUNTY	0.53	14835	13.6
		FORT WAYNE CONSORTIUM	0.72	15475	12.2
		DELAWARE-BLACKFORD CNST.	0.86	15149	13.8
		SOUTHWESTERN INDIANA CNST	0.54	15128	10.3
		STATE OF INDIANA (BOS)	0.75	13421	12.1
		MICHIANA CONSORTIUM	0.67	14987	9.9

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	MICHIGAN		0.72	18108	15.5
		STATE OF MICHIGAN (BOS)	0.73	15137	16.0
		G-L-S-F CONSORTIUM	0.80	20023	20.3
		LANSING CONSORTIUM	0.77	17807	11.8
		REGION II CONSORTIUM	0.79	16185	16.5
		GRAETC	0.77	15796	13.3
		MUSKEGON CONSORTIUM	0.72	16052	17.7
		CITY OF DEARBORN	1.00	20339	10.1
		CITY OF DETROIT	0.73	20339	20.3
		CITY OF LIVONIA	1.06	20339	8.0
		CITY OF WARREN	0.68	19393	18.2
		BAY COUNTY	0.74	16923	16.0
		KALAMAZOO COUNTY	0.79	17087	10.6
		MACOMB COUNTY	0.66	19393	17.4
		MONROE COUNTY	0.59	18408	14.6
		OAKLAND COUNTY	0.57	18698	15.0
		OTTAWA COUNTY	0.92	14461	10.6
		SAGINAW COUNTY	0.85	18890	17.1
		ST. CLAIR COUNTY	0.45	16276	15.9
		WAYNE COUNTY	0.62	20339	12.4
		CITY OF ANN ARBOR	0.47	18459	6.1
		WASHTENAW COUNTY	0.85	18459	12.6
		MID-COUNTIES CONSORTIUM	0.79	17386	16.1
		NORTHEAST MICHIGAN CNST.	0.76	13244	20.1
		LIVINGSTON COUNTY	0.81	13549	16.8

JOB TRAINING PARTNERSHIP ACT
TY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	MINNESOTA		0.71	15169	7.8
		DAKOTA COUNTY	0.55	14169	6.5
		RAMSEY COUNTY	0.48	17013	5.7
		CITY OF ST. PAUL	0.69	17013	6.8
		REGION III CONSORTIUM	0.68	15467	19.1
		MINN. DEPT. OF ECON.SEC.	0.77	12963	7.8
		RURAL MINNESOTA CEP	0.72	11299	9.6
		CITY OF MINNEAPOLIS	0.69	16857	6.5
		NORTH STAR CONSORTIUM	0.61	14197	6.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	OHIO		0.67	16317	12.5
		COLUMBIANA COUNTY	0.44	13256	16.0
		TRUMBULL COUNTY	0.52	19255	20.4
		MAHONING COUNTY	0.57	15189	15.1
		CITY OF YOUNGSTOWN	0.33	15188	24.4
		CUYAHOGA PARMA GEAUGA	0.46	17469	7.7
		CITY OF CLEVELAND	.	17669	15.7
		CITY OF CINCINNATI	0.85	17078	13.2
		BUTLER COUNTY	0.61	17930	12.1
		CLARK COUNTY	0.74	14269	13.8
		HAMILTON COUNTY	0.53	17078	7.9
		LORAIN COUNTY	0.73	17721	18.9
		AKRON SUMMIT MEDINA CNST.	0.64	16661	11.4
		CANTON STARK WAYNE CNST.	0.67	16787	13.3
		COLUMBUS FRANKLIN CNST.	0.55	15648	8.8
		CENTRAL OHIO CONSORTIUM	0.66	14511	12.6
		TOLEDO CONSORTIUM	0.91	17066	11.8
		STATE OF OHIO	0.68	14598	13.9
		ALLEN COUNTY	0.75	16804	14.3
		GREENE COUNTY	0.56	13352	9.7
		PORTAGE COUNTY	0.69	13989	13.6
		CLERMONT WARREN CNST.	0.77	14823	12.7
		RICHLAND MORROW CNST.	1.06	15781	14.8
		ASHTABULA COUNTY	0.69	14798	18.6
		LAKE COUNTY	0.95	15993	13.1
		SCIOTO COUNTY	0.79	12996	17.9
		CITY OF DAYTON	0.83	17285	17.0
		MONTGOMERY PREBLE CNST.	0.78	17864	9.2

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
5	WISCONSIN		0.68	14685	10.7
		COUNTY OF OUTAGAMIE	0.89	15121	10.2
		ROCK COUNTY	0.64	15325	16.0
		MILWAUKEE COUNTY	0.74	16786	11.0
		MADISON-DANE CONSORTIUM	0.86	14928	6.7
		W.O.W. CONSORTIUM	0.79	15163	9.5
		WINNE-FOND CONSORTIUM	0.71	14685	10.2
		TRICO-CETAC CONSORTIUM	0.63	15334	12.1
		STATE OF WISCONSIN	0.72	13098	10.7
		NORTHWEST WISCONSIN CEP	0.86	11521	13.0
		MARATHON COUNTY	0.61	14461	12.0

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
6	ARKANSAS		0.83	12937	9.8
		CITY OF LITTLE ROCK	0.41	14589	7.3
		TEXARKANA CONSORTIUM	1.04	14214	8.4
		STATE OF ARKANSAS CETA	0.86	12281	10.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
6	LOUISIANA		0.75	15980	10.3
		RAPIDES PARISH POLICE JUR	0.74	13351	11.1
		CITY OF BATON ROUGE E BAR	0.85	16543	7.8
		LAFAYETTE PARISH CST PROG	0.86	17966	5.2
		CALCASIEU PARISH POL JURY	0.64	17112	13.5
		OUACHITA PARISH POL JURY	0.47	14485	11.7
		CITY OF NEW ORLEANS	1.21	16511	9.2
		JEFFERSON PARISH	0.76	15571	8.8
		CITY OF SHREVEPORT	0.47	15636	9.7
		STATE OF LOUISIANA	0.85	15788	11.7

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
6	NEW MEXICO		0.75	14785	9.2
		CITY OF ALBUQUERQUE	0.83	14794	8.3
		GOVERNOR NEW MEXICO	0.69	14648	9.5

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
6	OKLAHOMA		0.75	15499	5.7
		COMANCHE CO BRD CO COMM	0.48	12640	4.8
		OKLAHOMA COUNTY	0.78	16567	4.1
		CITY OF OKLAHOMA CONS	0.65	16041	4.7
		CLEVELAND CO BRD CO COMM	0.59	12679	4.4
		CITY OF TULSA CONSORTIUM	0.52	17176	6.1
		GOVERNOR OF OKLAHOMA	0.87	14185	6.2

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
6	TEXAS		0.73	16201	6.9
		TEXAS PANHANDLE E&T ALLIA	0.56	14578	5.5
		CAPITAL AREA MANPOWER CON	0.71	13927	4.8
		SO EAST TX E&T PROGRAM	0.77	18098	10.7
		CAMERON COUNTY	0.93	11524	12.5
		COASTAL BEND CONSORTIUM	0.78	15272	7.1
		CITY OF DALLAS	0.84	17714	6.2
		DALLAS COUNTY CONSORTIUM	0.86	17714	4.4
		SOUTH PLAINS CONSORTIUM	0.49	13434	5.3
		WEST CENTRAL TX	0.45	13592	5.3
		CITY & COUNTY EL PASO	0.79	12499	11.1
		E TEXAS CETA CONSORTIUM	0.59	14386	8.1
		FT WORTH CONSORTIUM	0.60	15689	7.2
		GOLDEN TRIANGLE	0.61	17987	5.7
		TARRANT COUNTY	1.16	15669	5.5
		GALVESTON COUNTY	0.91	17059	10.6
		CITY OF HOUSTON	0.78	19654	7.8
		HARRIS COUNTY ETA	0.76	19654	5.7
		CENTRAL TX MP CONSORTIUM	0.45	12516	5.9
		COUNTY OF HIDALGO	0.69	10988	15.4
		ALAMO MANPOWER CONSORTIUM	0.88	13759	6.2
		CITY OF WACO	0.96	13311	6.4
		NORTH TEXAS ST PL REG CON	0.68	13672	6.8
		WEBB COUNTY COMM COURT	0.91	11505	16.3
		GULF COAST E&T CONSORTIUM	0.94	16716	6.2
		TEXAS DEPT COMM AFFAIRS	0.67	14078	6.9
		PERMIAN BASIN REG PL CONS	0.44	17596	6.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
7	IOWA		0.88	14218	8.5
		STATE OF IOWA	0.85	14773	8.6
		BLACKHAWK COUNTY	0.41	17912	12.1
		CILTC	0.86	14954	7.3
		LINN COUNTY	0.99	16073	9.7
		WOODBURY COUNTY	0.90	14156	8.0

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
7	KANSAS		0.76	14313	6.3
		STATE OF KANSAS	0.81	13310	5.5
		KANSAS CITY-WYANDOTTE CO	0.78	16481	7.8
		CITY OF WICHITA	0.72	16534	9.0
		TOPEKA SHAWNEE CO	1.15	14405	6.7

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
7	MISSOURI		0.66	14924	9.2
		ST OF MO	0.56	13898	9.5
		CITY OF SPRINGFIELD	0.81	13818	7.5
		JACKSON CO EMP & TRG	0.75	16152	7.4
		K C AREA EMP & TRG CONS	0.88	16271	9.9
		OFF OF MNPWR PROG	0.59	12772	11.2
		ST LOUIS CO	0.63	16431	7.8
		CITY OF ST LOUIS	1.03	16431	10.8
		CITY OF INDEPENDENCE	0.36	16152	8.1
		ST CHARLES CO COURT	0.81	14208	9.1

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
7	NEBRASKA		0.68	13203	6.1
		BAL OF STATE NEB	0.79	11946	5.9
		CITY OF LINCOLN	1.09	12955	5.2
		CITY OF OMAHA	0.51	14941	6.9

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	COLORADO		0.78	16137	7.7
		ADAMS COUNTY	0.62	16037	8.3
		ARAPAHOE COUNTY	0.74	16593	5.5
		BOULDER COUNTY	0.77	14912	6.6
		COLO SPRG COLO	0.79	13935	7.8
		CITY & COUNTY OF DENVER	0.90	18182	7.8
		JEFFERSON COUNTY	0.88	17565	5.9
		LARIMER COUNTY	0.78	14322	7.1
		PUEBLO COUNTY	0.88	16284	16.1
		WELD COUNTY	0.67	14018	7.4
		DIVISION OF EMPLOYMENT	0.83	13898	9.7

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	MONTANA		0.76	13946	8.6
		MT RURAL CEP	0.79	14659	9.6
		STATE OF MONTANA	0.75	13528	8.5

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	NORTH DAKOTA		1.07	13760	5.9
		STATE OF NORTH DAKOTA	1.07	13760	5.9

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	SOUTH DAKOTA		0.91	12079	5.5
		STATE OF SOUTH DAKOTA	0.89	11384	5.6
		MINNEHAHA COUNTY	1.28	14331	4.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	UTAH		0.62	15080	7.8
		STATE OF UTAH	0.22	14537	7.6
		DAVIS COUNTY	0.69	16032	5.9
		WEBER-MORGAN CONSORTIUM	0.62	13074	8.5
		MOUNTAINLAND ASSOC OF GOV	0.65	14369	8.7
		EMPLOYMENT & TRNG ADMIN	0.93	15618	7.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
8	WYOMING		0.83	17237	5.8
		STATE OF WYOMING	0.83	17237	5.8

JOB TRAINING PARTNERSHIP ACT
PY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
*	ARIZONA		0.76	15200	9.9
		ARIZONA-BOS	0.44	14278	16.7
		PHOENIX CITY	0.87	15540	8.1
		MARICOPA COUNTY GOVT	0.78	15540	7.5
		TUCSON CITY	0.90	15030	9.6
		PIMA COUNTY	0.80	15030	9.5

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
9	CALIFORNIA		0.75	16702	9.9
		ALAMEDA CO TRNG/EMPL BD	0.84	17811	7.8
		BERKELEY CITY	0.97	17911	9.3
		CONTRA COSTA COUNTY	0.82	16618	7.5
		MARIN COUNTY	0.75	14984	6.2
		OAKLAND CITY	0.74	17811	12.7
		RICHMOND CITY	0.86	16618	12.7
		SAN FRANCISCO CITY/CO	0.74	19155	8.4
		SAN MATEO COUNTY	0.85	18918	6.5
		SONOMA COUNTY	0.82	14848	10.3
		SOLANO COUNTY	0.88	16136	11.2
		SANTA BARBARA COUNTY	0.74	14671	7.9
		GLENDALE CITY	0.67	17957	6.4
		LONG BEACH CITY	0.63	17957	9.8
		LOS ANGELES COUNTY	0.57	17957	8.7
		ORANGE CO MANPOWER COMM	0.75	16503	7.2
		PASADENA CITY	0.80	17957	7.5
		TORRANCE CITY	0.23	17957	5.4
		VENTURA COUNTY BD OF SUP	0.98	15153	10.5
		CALIFORNIA-BOS	0.70	13741	15.4
		HUMBOLDT COUNTY	0.86	13973	16.7
		SANTA CLARA COUNTY	0.99	18697	7.7
		SUNNYVALE CITY	0.88	18657	5.9
		BUTTE COUNTY	0.62	17768	14.7
		SACRAMENTO E&T AGENCY	0.80	16177	11.8
		YOLO COUNTY	0.51	14389	12.8
		PLACER COUNTY	0.78	13499	12.7
		STOCKTON CITY	0.77	14376	16.1
		STANISLAUS COUNTY	0.84	13716	18.3
		SHASTA COUNTY	0.71	14735	18.3
		MONTEREY COUNTY	0.90	14032	11.6
		SANTA CRUZ COUNTY	0.72	12648	11.6
		FRESNO CITY/CO M/P COMM	0.65	12902	13.8
		IMPERIAL COUNTY	0.83	12382	31.2
		KERN COUNTY	0.87	15580	12.2
		MERCED COUNTY	0.65	12801	14.6
		INLAND MANPOWER ASSOC	0.75	14431	12.2
		SAN LUIS OBISPO COUNTY	0.57	13276	8.4
		SAN DIEGO RETC	0.70	15411	9.3
		TULARE COUNTY	0.77	11636	12.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
9	HAWAII		0.84	14472	6.7
		HAWAII-BOS	0.79	13360	8.8
		HONOLULU CITY/COUNTY	0.88	14668	6.1

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
9	NEVADA		0.79	15588	10.1
		NEVADA-BOS	1.03	15515	10.7
		LAS VEGAS/CLARK CO CONSOR	0.73	16165	10.9
		WASHOE COUNTY AREA COUNTY	1.02	15360	8.2

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
10	ALASKA		0.79	24525	9.9
		BALANCE OF STATE ALASKA	0.91	24689	12.3
		MUNICIPALITY OF ANCHORAGE	0.55	24338	7.5

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
10	IDAHO		0.86	14012	9.8
		IDAHO MANPOWER CONSORTIUM	0.86	14012	9.8

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
10	OREGON		0.80	15374	11.5
		CLACKAMAS	1.14	15213	10.0
		CITY OF EUGENE	1.08	14597	10.4
		OREGON CONSORTIUM	0.78	15781	13.5
		JACKSON/JOSEPHINE JOB COU	0.84	13686	14.7
		LANE COUNTY	0.83	14697	13.9
		MID-WILLAMETTE CONSORTIUM	0.79	14089	10.7
		MULTNOMAH/WASH CONSORTIUM	0.79	16730	8.9
		CITY OF PORTLAND	0.88	17847	10.7

JOB TRAINING PARTNERSHIP ACT
FY84 PERFORMANCE STANDARDS

REGION	STATE	SPONSOR NAME	PUBLIC ASSISTANCE ENTERED EMPLOYMENT RATE RATIO	AVERAGE WAGE FOR AREA CY 1981	UNEMPLOYMENT RATE CY 1982
10	WASHINGTON		0.74	17878	12.1
		BAL OF STATE WASHINGTON	0.75	15986	15.0
		CLARK COUNTY	0.45	16154	11.9
		KITSAP COUNTY	0.96	16171	8.7
		PIERCE COUNTY	0.77	16805	11.9
		THE CONSORTIUM	0.73	18733	9.9
		SNOHOMISH COUNTY	0.58	17718	11.8
		SPOKANE CITY/COUNTY CONS	0.89	15415	12.3
		CITY OF TACOMA	0.85	16885	13.5
		THURSTON COUNTY	1.09	15632	12.2
		YAKIMA COUNTY	0.61	12778	16.0

PERFORMANCE STANDARDS TERMS

1. PERFORMANCE STANDARD -- The numeric expression of the Department's expectations concerning program outcomes.

2. PERFORMANCE MEASURE -- The written expression of the Department's expectations concerning performance outcomes.

3. MODEL -- A layman's term of the regression equation used to establish performance standards.

4. SDA FACTOR VALUES -- Planned terminee characteristics, average weeks participated, and economic conditions found to influence performance.

5. NATIONAL FACTOR VALUES -- The average experiences of all FY 1982 CETA prime sponsors with regard to their actual terminee characteristics, average weeks participated, and local economic conditions.

6. WEIGHT -- The degree of influence (positive or negative) which a local factor has on performance expectations -- a layman's term for coefficient.

7. NATIONAL DEPARTURE POINT -- The national average performance level for a measure which reflects the actual performance achieved by the FY 1982 CETA prime sponsors -- the national average performance level.

8. PARAMETERS LIMITS -- Limitations established by the Secretary within which the Governor may vary the performance standards.

9. GOVERNOR'S ADJUSTMENT FACTOR -- The amount (percentage points or dollars) by which the Governor varies the performance standard in order to take into account exceptional circumstances or to reflect the imposition of a productivity improvement requirement.

LOCAL FACTORS INCLUDED IN THE MODELS

ADULT MEASURES

Entered Employment Rate	Cost per Entered Employment	Average Wage at Placement
% Female	% Female	% Female
% 45-54 years	% 45-54 years	% 45-54 years
% 55 years & over	% 55 years & over	% 55 years & over
% Black	% Black	% Black
% Hispanic	% Hispanic	% Hispanic
% Other minority	% Other minority	% Other minority
% Dropout	% Dropout	% Dropout
% Handicapped	% Handicapped	% Handicapped
% UI claimant	% UI claimant	% UI claimant
% Welfare recipient	% Welfare recipient	% Welfare recipient
Average wage for area (000)	Average wage for area (000)	Average wage for area (000)
Unemployment rate	Unemployment rate	
	Average weeks participated	

YOUTH MEASURES

Entered Employment Rate	Positive Termination Rate	Cost per Positive Termination
% Female	% Female	% Female
% 14-15 years	% 14-15 years	% 14-15 years
% 16-19 years	% 16-19 years	% 16-19 years
% Black	% Black	% Black
% Hispanic	% Hispanic	% Hispanic
% Other minority	% Other minority	% Other minority
% Dropout	% Dropout	% Dropout
% UI claimant	% UI claimant	% UI claimant
% Welfare recipient	% Welfare recipient	% Welfare recipient
Average wage for area (000)	Average wage for area (000)	Average wage for area (000)
Unemployment rate	Unemployment rate	Unemployment rate
		Average weeks participated